

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LARRY BRINSON,

Plaintiff,

v.

BRG SPORTS, LLC, a corporation, f/k/a
EASTON-BELL SPORTS, LLC; EB
SPORTS CORP., a corporation; BRG
SPORTS HOLDINGS CORP., a corporation,
f/k/a RBG HOLDINGS CORP.; BRG
SPORTS, INC.; RIDDELL SPORTS
GROUP, INC.; RIDDELL, INC.; and ALL
AMERICAN SPORTS CORPORATION
(collectively "RIDDELL"),

Defendants.

MDL No. 2323

**IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION**

JURY TRIAL DEMANDED

SHORT FORM COMPLAINT

1. Plaintiff, LARRY BRINSON, brings this civil action as a related action in the matter entitled IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION, MDL No. 2323.

~~2. Plaintiff is filing this short form complaint as required by this Court's Case Management Order No. 7709, filed October 24, 2017.~~

3. Plaintiff (and, if applicable, Plaintiff's Spouse) continue to maintain claims against Riddell Defendants after a Class Action Settlement was entered into between the NFL Defendants and certain Plaintiffs.

4. Plaintiff (and, if applicable, Plaintiff's Spouse) incorporate by reference the allegations (as designated below) of the Second Amended Master Administrative Long-Form Complaint Against Riddell Defendants, as is fully set forth at length in this Short Form Complaint. ~~However, Plaintiff denies that there is federal subject matter jurisdiction over this action.~~

5. ~~Plaintiff is filing this case in a representative capacity as the _____ of _____, having been duly appointed as the _____ by the Court of _____.~~

6. Plaintiff, Larry Brinson, is a resident and citizen of Texas and claims damages as set forth below.

7. ~~Plaintiffs Spouse, _____ is a resident and citizen of _____, and claims damages as a result of loss of consortium proximately caused by the harm suffered by her Plaintiff husband.~~

8. Upon information and belief, the Plaintiff sustained repetitive, traumatic subconcussive and/or concussive head impacts during NFL games and/or practices. Upon information and belief, Plaintiff suffers from symptoms of brain injury caused by the repetitive, traumatic sub-concussive and/or concussive head impacts the Plaintiff sustained during NFL games and/or practices. Upon information and belief, the Plaintiff's symptoms arise from injuries that are latent and have developed and continue to develop over time.

9. The original complaint by Plaintiff in this matter was filed in the Circuit Court of Cook County, Illinois on July 13, 2016. ~~If the case is remanded, it should be remanded to the Circuit Court of Cook County, Illinois.~~

10. Plaintiff claim damages as a result of [check all that apply]:

☒ Injury to Herself/Himself

☐ Injury to the Person Represented

☐ Wrongful death

☐ Survivorship Action

☒ Economic Loss

☒ Loss of Services

☒ Loss of Consortium

11. Plaintiff (and Plaintiff Spouse) bring this case against the following Defendants in this action [check all that apply]:

☒ Riddell, Inc.

☒ All American Sports, Inc. (d/b/a Riddell Sports Group, Inc.)

☒ Riddell Sports Group, Inc.

☒ Easton-Bell Sports, Inc.

☒ Easton-Bell Sports, LLC

☒ EB Sports Corporation

☒ RBG Holdings Corporation

12. The Plaintiff wore one or more helmets designed and/or manufactured by the Riddell Defendants during one or more years Plaintiff played in the NFL and/or AFL.

13. Plaintiff played in ☒ the National Football League ("NFL") and/or in and/or in the ☐ American Football League ("AFL") during the following period of time: 1977-1980 for the following teams: Dallas Cowboys and Seattle Seahawks.

14. Plaintiff retired from playing professional football after the 1980 season.

CAUSES OF ACTION

15. Plaintiff herein adopt by reference the following Counts of the Second Amended Master Administrative Long-Form Complaint, along with the factual allegations incorporated by reference in those Counts [check all that apply]:

- √ Count I (Negligence)
- √ Count II (Negligent Marketing)
- √ Count III (Negligent Misrepresentation)
- √ Count IV (Fraud)
- √ Count V (Strict Liability/Design Defect)
- √ Count VI (Failure to Warn)
- √ Count VII (Breach of Implied Warranty)
- √ Count VIII (Civil Conspiracy)
- √ Count IX (Fraudulent Concealment)
- ☐ Count X (Wrongful Death)
- ☐ Count XI (Survival Action)
- √ Count XII (Loss of Consortium)
- √ Count XIII (Punitive Damages under All Claims)
- √ Count XIV (Declaratory Relief: Punitive Damages)

PRAYER FOR RELIEF

WHEREFORE, Plaintiff (and, if applicable Plaintiff Spouse) pray for judgment as follows:

A. An award of compensatory damages, the amount of which will be determined at trial;

- B. An award of economic damages in the form of medical expenses, out of pocket expenses, lost earnings and other economic damages in an amount to be determined at trial;
- C. For punitive and exemplary damages as applicable;
- D. For all applicable statutory damages of the state whose laws will govern this action;
- E. For loss of consortium as applicable;
- F. For declaratory relief as applicable;
- G. For an award of attorneys' fees and costs;
- H. An award of prejudgment interest and costs of suit; and
- I. An award of such other and further relief as the Court deems just and proper.

JURY DEMANDED

Pursuant to Federal Rule of Civil Procedure 38, Plaintiff hereby demand a trial by jury on all issues so triable.

January 10, 2020

Respectfully Submitted:

By: /s/ William T. Gibbs

William T. Gibbs
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ARDC No. 6282949

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

GILL BYRD,

Plaintiff,

v.

BRG SPORTS, LLC, a corporation, f/k/a
EASTON-BELL SPORTS, LLC; EB
SPORTS CORP., a corporation; BRG
SPORTS HOLDINGS CORP., a corporation,
f/k/a RBG HOLDINGS CORP.; BRG
SPORTS, INC.; RIDDELL SPORTS
GROUP, INC.; RIDDELL, INC.; and ALL
AMERICAN SPORTS CORPORATION
(collectively "RIDDELL"),

Defendants.

No. MDL No. 2323

**IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION**

JURY TRIAL DEMANDED

SHORT FORM COMPLAINT

1. Plaintiff, GILL BYRD, brings this civil action as a related action in the matter entitled IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION, MDL No. 2323.

~~2. Plaintiff is filing this short form complaint as required by this Court's Case Management Order No. 7709, filed October 24, 2017.~~

3. Plaintiff (and, if applicable, Plaintiff's Spouse) continue to maintain claims against Riddell Defendants after a Class Action Settlement was entered into between the NFL Defendants and certain Plaintiff

4. Plaintiff (and, if applicable, Plaintiff's Spouse) incorporate by reference the allegations (as designated below) of the Second Amended Master Administrative Long-Form Complaint Against Riddell Defendants, as is fully set forth at length in this Short Form Complaint. ~~However, Plaintiff denies that there is federal subject matter jurisdiction over this action.~~

5. ~~Plaintiff is filing this case in a representative capacity as the _____ of _____, having been duly appointed as the _____ by the Court of _____.~~

6. Plaintiff, GILL BYRD, is a resident and citizen of Illinois and claims damages as set forth below.

7. ~~Plaintiff's Spouse, _____ is a resident and citizen of _____, and claims damages as a result of loss of consortium proximately caused by the harm suffered by her Plaintiff husband.~~

8. Upon information and belief, the Plaintiff sustained repetitive, traumatic subconcussive and/or concussive head impacts during NFL games and/or practices. Upon information and belief, Plaintiff suffers from symptoms of brain injury caused by the repetitive, traumatic sub-concussive and/or concussive head impacts the Plaintiff sustained during NFL games and/or practices. Upon information and belief, the Plaintiff's symptoms arise from injuries that are latent and have developed and continue to develop over time.

9. The original complaint by Plaintiff in this matter was filed in the Circuit Court of Cook County, Illinois on July 13, 2016. ~~If the case is remanded, it should be remanded to the Circuit Court of Cook County, Illinois.~~

10. Plaintiff claim damages as a result of [check all that apply]:

☒ Injury to Herself/Himself

☐ Injury to the Person Represented

☐ Wrongful death

☐ Survivorship Action

☒ Economic Loss

☒ Loss of Services

☒ Loss of Consortium

11. Plaintiff (and Plaintiff Spouse) bring this case against the following Defendants in this action [check all that apply]:

☒ Riddell, Inc.

☒ All American Sports, Inc. (d/b/a Riddell Sports Group, Inc.)

☒ Riddell Sports Group, Inc.

☒ Easton-Bell Sports, Inc.

☒ Easton-Bell Sports, LLC

☒ EB Sports Corporation

☒ RBG Holdings Corporation

12. The Plaintiff wore one or more helmets designed and/or manufactured by the Riddell Defendants during one or more years Plaintiff played in the NFL and/or AFL.

13. Plaintiff played in ☒ the National Football League ("NFL") and/or in and/or in the ☐ American Football League ("AFL") during the following period of time: 1998-1993 for the following teams: San Diego Chargers.

14. Plaintiff retired from playing professional football after the 1993 season.

CAUSES OF ACTION

15. Plaintiff herein adopt by reference the following Counts of the Second Amended Master Administrative Long-Form Complaint, along with the factual allegations incorporated by reference in those Counts [check all that apply]:

- √ Count I (Negligence)
- √ Count II (Negligent Marketing)
- √ Count III (Negligent Misrepresentation)
- √ Count IV (Fraud)
- √ Count V (Strict Liability/Design Defect)
- √ Count VI (Failure to Warn)
- √ Count VII (Breach of Implied Warranty)
- √ Count VIII (Civil Conspiracy)
- √ Count IX (Fraudulent Concealment)
- ☐ Count X (Wrongful Death)
- ☐ Count XI (Survival Action)
- √ Count XII (Loss of Consortium)
- √ Count XIII (Punitive Damages under All Claims)
- √ Count XIV (Declaratory Relief: Punitive Damages)

PRAYER FOR RELIEF

WHEREFORE, Plaintiff (and, if applicable Plaintiff Spouse) pray for judgment as follows:

- A. An award of compensatory damages, the amount of which will be determined at trial;
- B. An award of economic damages in the form of medical expenses, out of pocket expenses, lost earnings and other economic damages in an amount to be determined at trial;
- C. For punitive and exemplary damages as applicable;
- D. For all applicable statutory damages of the state whose laws will govern this action;
- E. For loss of consortium as applicable;
- F. For declaratory relief as applicable;
- G. For an award of attorneys' fees and costs;
- H. An award of prejudgment interest and costs of suit; and
- I. An award of such other and further relief as the Court deems just and proper.

JURY DEMANDED

Pursuant to Federal Rule of Civil Procedure 38, Plaintiff hereby demand a trial by jury on all issues so triable.

January 10, 2020

Respectfully Submitted:

By: /s/ William T. Gibbs

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**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ADRIAN COXSON,

Plaintiff,

v.

BRG SPORTS, LLC, a corporation, f/k/a
EASTON-BELL SPORTS, LLC; EB
SPORTS CORP., a corporation; BRG
SPORTS HOLDINGS CORP., a corporation,
f/k/a RBG HOLDINGS CORP.; BRG
SPORTS, INC.; RIDDELL SPORTS
GROUP, INC.; RIDDELL, INC.; and ALL
AMERICAN SPORTS CORPORATION
(collectively "RIDDELL"),

Defendants.

MDL No. 2323

**IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION**

JURY TRIAL DEMANDED

SHORT FORM COMPLAINT

1. Plaintiff, ADRIAN COXSON, brings this civil action as a related action in the matter entitled IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION, MDL No. 2323.

~~2. Plaintiff is filing this short form complaint as required by this Court's Case Management Order No. 7709, filed October 24, 2017.~~

3. Plaintiff (and, if applicable, Plaintiff's Spouse) continue to maintain claims against Riddell Defendants after a Class Action Settlement was entered into between the NFL Defendants and certain Plaintiffs.

4. Plaintiff (and, if applicable, Plaintiff's Spouse) incorporate by reference the allegations (as designated below) of the Second Amended Master Administrative Long-Form Complaint Against Riddell Defendants, as is fully set forth at length in this Short Form Complaint. ~~However, Plaintiff denies that there is federal subject matter jurisdiction over this action.~~

5. ~~Plaintiff is filing this case in a representative capacity as the _____ of _____, having been duly appointed as the _____ by the Court of _____.~~

6. Plaintiff, Adrian Coxson, is a resident and citizen of Georgia and claims damages as set forth below.

7. ~~Plaintiffs Spouse, _____ is a resident and citizen of _____, and claims damages as a result of loss of consortium proximately caused by the harm suffered by her Plaintiff husband.~~

8. Upon information and belief, the Plaintiff sustained repetitive, traumatic subconcussive and/or concussive head impacts during NFL games and/or practices. Upon information and belief, Plaintiff suffers from symptoms of brain injury caused by the repetitive, traumatic sub-concussive and/or concussive head impacts the Plaintiff sustained during NFL games and/or practices. Upon information and belief, the Plaintiff's symptoms arise from injuries that are latent and have developed and continue to develop over time.

9. The original complaint by Plaintiff in this matter was filed in the Circuit Court of Cook County, Illinois on December 19, 2016. ~~If the case is remanded, it should be remanded to the Circuit Court of Cook County, Illinois.~~

10. Plaintiff claim damages as a result of [check all that apply]:

☒ Injury to Herself/Himself

- ☐ Injury to the Person Represented
- ☐ Wrongful death
- ☐ Survivorship Action
- ☒ Economic Loss
- ☒ Loss of Services
- ☒ Loss of Consortium

11. Plaintiff (and Plaintiff Spouse) bring this case against the following Defendants in this action [check all that apply]:

- ☒ Riddell, Inc.
- ☒ All American Sports, Inc. (d/b/a Riddell Sports Group, Inc.)
- ☒ Riddell Sports Group, Inc.
- ☒ Easton-Bell Sports, Inc.
- ☒ Easton-Bell Sports, LLC
- ☒ EB Sports Corporation
- ☒ RBG Holdings Corporation

12. The Plaintiff wore one or more helmets designed and/or manufactured by the Riddell Defendants during one or more years Plaintiff played in the NFL and/or AFL.

13. Plaintiff played in ☒ the National Football League ("NFL") and/or in and/or in the ☐ American Football League ("AFL") during the following period of time: 2015-2015 for the following teams: Green Bay Packers.

14. Plaintiff retired from playing professional football after the 2015 season.

CAUSES OF ACTION

15. Plaintiff herein adopt by reference the following Counts of the Second Amended Master Administrative Long-Form Complaint, along with the factual allegations incorporated by reference in those Counts [check all that apply]:

- √ Count I (Negligence)
- √ Count II (Negligent Marketing)
- √ Count III (Negligent Misrepresentation)
- √ Count IV (Fraud)
- √ Count V (Strict Liability/Design Defect)
- √ Count VI (Failure to Warn)
- √ Count VII (Breach of Implied Warranty)
- √ Count VIII (Civil Conspiracy)
- √ Count IX (Fraudulent Concealment)
- ☐ Count X (Wrongful Death)
- ☐ Count XI (Survival Action)
- √ Count XII (Loss of Consortium)
- √ Count XIII (Punitive Damages under All Claims)
- √ Count XIV (Declaratory Relief: Punitive Damages)

PRAYER FOR RELIEF

WHEREFORE, Plaintiff (and, if applicable Plaintiff Spouse) pray for judgment as follows:

A. An award of compensatory damages, the amount of which will be determined at trial;

- B. An award of economic damages in the form of medical expenses, out of pocket expenses, lost earnings and other economic damages in an amount to be determined at trial;
- C. For punitive and exemplary damages as applicable;
- D. For all applicable statutory damages of the state whose laws will govern this action;
- E. For loss of consortium as applicable;
- F. For declaratory relief as applicable;
- G. For an award of attorneys' fees and costs;
- H. An award of prejudgment interest and costs of suit; and
- I. An award of such other and further relief as the Court deems just and proper.

JURY DEMANDED

Pursuant to Federal Rule of Civil Procedure 38, Plaintiff hereby demand a trial by jury on all issues so triable.

January 10, 2020

Respectfully Submitted:

By: /s/ William T. Gibbs

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ARDC No. 6282949

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JACOB CUTRERA,

Plaintiff,

v.

BRG SPORTS, LLC, a corporation, f/k/a
EASTON-BELL SPORTS, LLC; EB
SPORTS CORP., a corporation; BRG
SPORTS HOLDINGS CORP., a corporation,
f/k/a RBG HOLDINGS CORP.; BRG
SPORTS, INC.; RIDDELL SPORTS
GROUP, INC.; RIDDELL, INC.; and ALL
AMERICAN SPORTS CORPORATION
(collectively "RIDDELL"),

Defendants.

MDL No. 2323

**IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION**

JURY TRIAL DEMANDED

SHORT FORM COMPLAINT

1. Plaintiff, JACOB CUTRERA, brings this civil action as a related action in the matter entitled IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION, MDL No. 2323.

~~2. Plaintiff is filing this short form complaint as required by this Court's Case Management Order No. 7709, filed October 24, 2017.~~

3. Plaintiff (and, if applicable, Plaintiff's Spouse) continue to maintain claims against Riddell Defendants after a Class Action Settlement was entered into between the NFL Defendants and certain Plaintiffs.

4. Plaintiff (and, if applicable, Plaintiff's Spouse) incorporate by reference the allegations (as designated below) of the Second Amended Master Administrative Long-Form Complaint Against Riddell Defendants, as is fully set forth at length in this Short Form Complaint. ~~However, Plaintiff denies that there is federal subject matter jurisdiction over this action.~~

5. ~~Plaintiff is filing this case in a representative capacity as the _____ of _____, having been duly appointed as the _____ by the Court of _____.~~

6. Plaintiff, Jacob Cutrera, is a resident and citizen of Louisiana and claims damages as set forth below.

7. ~~Plaintiffs Spouse, _____ is a resident and citizen of _____, and claims damages as a result of loss of consortium proximately caused by the harm suffered by her Plaintiff husband.~~

8. Upon information and belief, the Plaintiff sustained repetitive, traumatic subconcussive and/or concussive head impacts during NFL games and/or practices. Upon information and belief, Plaintiff suffers from symptoms of brain injury caused by the repetitive, traumatic sub-concussive and/or concussive head impacts the Plaintiff sustained during NFL games and/or practices. Upon information and belief, the Plaintiff's symptoms arise from injuries that are latent and have developed and continue to develop over time.

9. The original complaint by Plaintiff in this matter was filed in the Circuit Court of Cook County, Illinois on January 17, 2017. ~~If the case is remanded, it should be remanded to the Circuit Court of Cook County, Illinois.~~

10. Plaintiff claim damages as a result of [check all that apply]:

☒ Injury to Herself/Himself

- ☐ Injury to the Person Represented
- ☐ Wrongful death
- ☐ Survivorship Action
- ☒ Economic Loss
- ☒ Loss of Services
- ☒ Loss of Consortium

11. Plaintiff (and Plaintiff Spouse) bring this case against the following Defendants in this action [check all that apply]:

- ☒ Riddell, Inc.
- ☒ All American Sports, Inc. (d/b/a Riddell Sports Group, Inc.)
- ☒ Riddell Sports Group, Inc.
- ☒ Easton-Bell Sports, Inc.
- ☒ Easton-Bell Sports, LLC
- ☒ EB Sports Corporation
- ☒ RBG Holdings Corporation

12. The Plaintiff wore one or more helmets designed and/or manufactured by the Riddell Defendants during one or more years Plaintiff played in the NFL and/or AFL.

13. Plaintiff played in ☒ the National Football League ("NFL") and/or in and/or in the ☐ American Football League ("AFL") during the following period of time: 2010-2012 for the following teams: Jacksonville Jaguars and Tampa Bay Buccaneers.

14. Plaintiff retired from playing professional football after the 2012 season.

CAUSES OF ACTION

15. Plaintiff herein adopt by reference the following Counts of the Second Amended Master Administrative Long-Form Complaint, along with the factual allegations incorporated by reference in those Counts [check all that apply]:

- √ Count I (Negligence)
- √ Count II (Negligent Marketing)
- √ Count III (Negligent Misrepresentation)
- √ Count IV (Fraud)
- √ Count V (Strict Liability/Design Defect)
- √ Count VI (Failure to Warn)
- √ Count VII (Breach of Implied Warranty)
- √ Count VIII (Civil Conspiracy)
- √ Count IX (Fraudulent Concealment)
- ☐ Count X (Wrongful Death)
- ☐ Count XI (Survival Action)
- √ Count XII (Loss of Consortium)
- √ Count XIII (Punitive Damages under All Claims)
- √ Count XIV (Declaratory Relief: Punitive Damages)

PRAYER FOR RELIEF

WHEREFORE, Plaintiff (and, if applicable Plaintiff Spouse) pray for judgment as follows:

A. An award of compensatory damages, the amount of which will be determined at trial;

- B. An award of economic damages in the form of medical expenses, out of pocket expenses, lost earnings and other economic damages in an amount to be determined at trial;
- C. For punitive and exemplary damages as applicable;
- D. For all applicable statutory damages of the state whose laws will govern this action;
- E. For loss of consortium as applicable;
- F. For declaratory relief as applicable;
- G. For an award of attorneys' fees and costs;
- H. An award of prejudgment interest and costs of suit; and
- I. An award of such other and further relief as the Court deems just and proper.

JURY DEMANDED

Pursuant to Federal Rule of Civil Procedure 38, Plaintiff hereby demand a trial by jury on all issues so triable.

January 10, 2020

Respectfully Submitted:

By: /s/ William T. Gibbs

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**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

DONALD ELDER,

Plaintiff,

v.

BRG SPORTS, LLC, a corporation, f/k/a
EASTON-BELL SPORTS, LLC; EB
SPORTS CORP., a corporation; BRG
SPORTS HOLDINGS CORP., a corporation,
f/k/a RBG HOLDINGS CORP.; BRG
SPORTS, INC.; RIDDELL SPORTS
GROUP, INC.; RIDDELL, INC.; and ALL
AMERICAN SPORTS CORPORATION
(collectively "RIDDELL"),

Defendants.

MDL No. 2323

**IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION**

JURY TRIAL DEMANDED

SHORT FORM COMPLAINT

1. Plaintiff, DONALD ELDER, brings this civil action as a related action in the matter entitled IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION, MDL No. 2323.

~~2. Plaintiff is filing this short form complaint as required by this Court's Case Management Order No. 7709, filed October 24, 2017.~~

3. Plaintiff (and, if applicable, Plaintiff's Spouse) continue to maintain claims against Riddell Defendants after a Class Action Settlement was entered into between the NFL Defendants and certain Plaintiffs.

4. Plaintiff (and, if applicable, Plaintiff's Spouse) incorporate by reference the allegations (as designated below) of the Second Amended Master Administrative Long-Form Complaint Against Riddell Defendants, as is fully set forth at length in this Short Form Complaint. ~~However, Plaintiff denies that there is federal subject matter jurisdiction over this action.~~

5. ~~Plaintiff is filing this case in a representative capacity as the _____ of _____, having been duly appointed as the _____ by the Court of _____.~~

6. Plaintiff, Donald Elder, is a resident and citizen of Florida and claims damages as set forth below.

7. ~~Plaintiffs Spouse, _____ is a resident and citizen of _____, and claims damages as a result of loss of consortium proximately caused by the harm suffered by her Plaintiff husband.~~

8. Upon information and belief, the Plaintiff sustained repetitive, traumatic subconcussive and/or concussive head impacts during NFL games and/or practices. Upon information and belief, Plaintiff suffers from symptoms of brain injury caused by the repetitive, traumatic sub-concussive and/or concussive head impacts the Plaintiff sustained during NFL games and/or practices. Upon information and belief, the Plaintiff's symptoms arise from injuries that are latent and have developed and continue to develop over time.

9. The original complaint by Plaintiff in this matter was filed in the Circuit Court of Cook County, Illinois on August 25, 2016. ~~If the case is remanded, it should be remanded to the Circuit Court of Cook County, Illinois.~~

10. Plaintiff claim damages as a result of [check all that apply]:

☒ Injury to Herself/Himself

- ☐ Injury to the Person Represented
- ☐ Wrongful death
- ☐ Survivorship Action
- ☒ Economic Loss
- ☒ Loss of Services
- ☒ Loss of Consortium

11. Plaintiff (and Plaintiff Spouse) bring this case against the following Defendants in this action [check all that apply]:

- ☒ Riddell, Inc.
- ☒ All American Sports, Inc. (d/b/a Riddell Sports Group, Inc.)
- ☒ Riddell Sports Group, Inc.
- ☒ Easton-Bell Sports, Inc.
- ☒ Easton-Bell Sports, LLC
- ☒ EB Sports Corporation
- ☒ RBG Holdings Corporation

12. The Plaintiff wore one or more helmets designed and/or manufactured by the Riddell Defendants during one or more years Plaintiff played in the NFL and/or AFL.

13. Plaintiff played in ☒ the National Football League ("NFL") and/or in and/or in the ☐ American Football League ("AFL") during the following period of time: 1985-1992 for the following teams: New York Jets, Detroit Lions, Pittsburgh Steelers, Tampa Bay Buccaneers and San Diego Chargers.

14. Plaintiff retired from playing professional football after the 1992 season.

CAUSES OF ACTION

15. Plaintiff herein adopt by reference the following Counts of the Second Amended Master Administrative Long-Form Complaint, along with the factual allegations incorporated by reference in those Counts [check all that apply]:

- √ Count I (Negligence)
- √ Count II (Negligent Marketing)
- √ Count III (Negligent Misrepresentation)
- √ Count IV (Fraud)
- √ Count V (Strict Liability/Design Defect)
- √ Count VI (Failure to Warn)
- √ Count VII (Breach of Implied Warranty)
- √ Count VIII (Civil Conspiracy)
- √ Count IX (Fraudulent Concealment)
- ☐ Count X (Wrongful Death)
- ☐ Count XI (Survival Action)
- √ Count XII (Loss of Consortium)
- √ Count XIII (Punitive Damages under All Claims)
- √ Count XIV (Declaratory Relief: Punitive Damages)

PRAYER FOR RELIEF

WHEREFORE, Plaintiff (and, if applicable Plaintiff Spouse) pray for judgment as follows:

A. An award of compensatory damages, the amount of which will be determined at trial;

- B. An award of economic damages in the form of medical expenses, out of pocket expenses, lost earnings and other economic damages in an amount to be determined at trial;
- C. For punitive and exemplary damages as applicable;
- D. For all applicable statutory damages of the state whose laws will govern this action;
- E. For loss of consortium as applicable;
- F. For declaratory relief as applicable;
- G. For an award of attorneys' fees and costs;
- H. An award of prejudgment interest and costs of suit; and
- I. An award of such other and further relief as the Court deems just and proper.

JURY DEMANDED

Pursuant to Federal Rule of Civil Procedure 38, Plaintiff hereby demand a trial by jury on all issues so triable.

January 10, 2020

Respectfully Submitted:

By: /s/ William T. Gibbs

William T. Gibbs
Corboy & Demetrio, P.C.
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ARDC No. 6282949

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

HENRY ELLARD,

Plaintiff,

v.

BRG SPORTS, LLC, a corporation, f/k/a
EASTON-BELL SPORTS, LLC; EB
SPORTS CORP., a corporation; BRG
SPORTS HOLDINGS CORP., a corporation,
f/k/a RBG HOLDINGS CORP.; BRG
SPORTS, INC.; RIDDELL SPORTS
GROUP, INC.; RIDDELL, INC.; and ALL
AMERICAN SPORTS CORPORATION
(collectively "RIDDELL"),

Defendants.

MDL No. 2323

**IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION**

JURY TRIAL DEMANDED

SHORT FORM COMPLAINT

1. Plaintiff, HENRY ELLARD, brings this civil action as a related action in the matter entitled IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION, MDL No. 2323.

~~2. Plaintiff is filing this short form complaint as required by this Court's Case Management Order No. 7709, filed October 24, 2017.~~

3. Plaintiff (and, if applicable, Plaintiff's Spouse) continue to maintain claims against Riddell Defendants after a Class Action Settlement was entered into between the NFL Defendants and certain Plaintiffs.

4. Plaintiff (and, if applicable, Plaintiff's Spouse) incorporate by reference the allegations (as designated below) of the Second Amended Master Administrative Long-Form Complaint Against Riddell Defendants, as is fully set forth at length in this Short Form Complaint. ~~However, Plaintiff denies that there is federal subject matter jurisdiction over this action.~~

5. ~~Plaintiff is filing this case in a representative capacity as the _____ of _____, having been duly appointed as the _____ by the Court of _____.~~

6. Plaintiff, Henry Ellard, is a resident and citizen of Texas and claims damages as set forth below.

7. ~~Plaintiffs Spouse, _____ is a resident and citizen of _____, and claims damages as a result of loss of consortium proximately caused by the harm suffered by her Plaintiff husband.~~

8. Upon information and belief, the Plaintiff sustained repetitive, traumatic subconcussive and/or concussive head impacts during NFL games and/or practices. Upon information and belief, Plaintiff suffers from symptoms of brain injury caused by the repetitive, traumatic sub-concussive and/or concussive head impacts the Plaintiff sustained during NFL games and/or practices. Upon information and belief, the Plaintiff's symptoms arise from injuries that are latent and have developed and continue to develop over time.

9. The original complaint by Plaintiff in this matter was filed in the Circuit Court of Cook County, Illinois on August 25, 2016. ~~If the case is remanded, it should be remanded to the Circuit Court of Cook County, Illinois.~~

10. Plaintiff claim damages as a result of [check all that apply]:

☒ Injury to Herself/Himself

- ☐ Injury to the Person Represented
- ☐ Wrongful death
- ☐ Survivorship Action
- ☒ Economic Loss
- ☒ Loss of Services
- ☒ Loss of Consortium

11. Plaintiff (and Plaintiff Spouse) bring this case against the following Defendants in this action [check all that apply]:

- ☒ Riddell, Inc.
- ☒ All American Sports, Inc. (d/b/a Riddell Sports Group, Inc.)
- ☒ Riddell Sports Group, Inc.
- ☒ Easton-Bell Sports, Inc.
- ☒ Easton-Bell Sports, LLC
- ☒ EB Sports Corporation
- ☒ RBG Holdings Corporation

12. The Plaintiff wore one or more helmets designed and/or manufactured by the Riddell Defendants during one or more years Plaintiff played in the NFL and/or AFL.

13. Plaintiff played in ☒ the National Football League ("NFL") and/or in and/or in the ☐ American Football League ("AFL") during the following period of time: 1983-1998 for the following teams: Los Angeles Rams, Washington Redskins and New England Patriots.

14. Plaintiff retired from playing professional football after the 1998 season.

CAUSES OF ACTION

15. Plaintiff herein adopt by reference the following Counts of the Second Amended Master Administrative Long-Form Complaint, along with the factual allegations incorporated by reference in those Counts [check all that apply]:

- √ Count I (Negligence)
- √ Count II (Negligent Marketing)
- √ Count III (Negligent Misrepresentation)
- √ Count IV (Fraud)
- √ Count V (Strict Liability/Design Defect)
- √ Count VI (Failure to Warn)
- √ Count VII (Breach of Implied Warranty)
- √ Count VIII (Civil Conspiracy)
- √ Count IX (Fraudulent Concealment)
- ☐ Count X (Wrongful Death)
- ☐ Count XI (Survival Action)
- √ Count XII (Loss of Consortium)
- √ Count XIII (Punitive Damages under All Claims)
- √ Count XIV (Declaratory Relief: Punitive Damages)

PRAYER FOR RELIEF

WHEREFORE, Plaintiff (and, if applicable Plaintiff Spouse) pray for judgment as follows:

- A. An award of compensatory damages, the amount of which will be determined at trial;
- B. An award of economic damages in the form of medical expenses, out of pocket expenses, lost earnings and other economic damages in an amount to be determined at trial;
- C. For punitive and exemplary damages as applicable;
- D. For all applicable statutory damages of the state whose laws will govern this action;
- E. For loss of consortium as applicable;
- F. For declaratory relief as applicable;
- G. For an award of attorneys' fees and costs;
- H. An award of prejudgment interest and costs of suit; and
- I. An award of such other and further relief as the Court deems just and proper.

JURY DEMANDED

Pursuant to Federal Rule of Civil Procedure 38, Plaintiff hereby demand a trial by jury on all issues so triable.

January 10, 2020

Respectfully Submitted:

By: /s/ William T. Gibbs

William T. Gibbs
Corboy & Demetrio, P.C.
Attorneys for Plaintiff
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ARDC No. 6282949

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LAWRENCE GAINES,

Plaintiff,

v.

BRG SPORTS, LLC, a corporation, f/k/a
EASTON-BELL SPORTS, LLC; EB
SPORTS CORP., a corporation; BRG
SPORTS HOLDINGS CORP., a corporation,
f/k/a RBG HOLDINGS CORP.; BRG
SPORTS, INC.; RIDDELL SPORTS
GROUP, INC.; RIDDELL, INC.; and ALL
AMERICAN SPORTS CORPORATION
(collectively "RIDDELL"),

Defendants.

MDL No. 2323

**IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION**

JURY TRIAL DEMANDED

SHORT FORM COMPLAINT

1. Plaintiff, LAWRENCE GAINES, brings this civil action as a related action in the matter entitled IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION, MDL No. 2323.

~~2. Plaintiff is filing this short form complaint as required by this Court's Case Management Order No. 7709, filed October 24, 2017.~~

3. Plaintiff (and, if applicable, Plaintiff's Spouse) continue to maintain claims against Riddell Defendants after a Class Action Settlement was entered into between the NFL Defendants and certain Plaintiffs.

4. Plaintiff (and, if applicable, Plaintiff's Spouse) incorporate by reference the allegations (as designated below) of the Second Amended Master Administrative Long-Form Complaint Against Riddell Defendants, as is fully set forth at length in this Short Form Complaint. ~~However, Plaintiff denies that there is federal subject matter jurisdiction over this action.~~

5. ~~Plaintiff is filing this case in a representative capacity as the _____ of _____, having been duly appointed as the _____ by the Court of _____.~~

6. Plaintiff, Lawrence Gaines, is a resident and citizen of Michigan and claims damages as set forth below.

7. ~~Plaintiffs Spouse, _____ is a resident and citizen of _____, and claims damages as a result of loss of consortium proximately caused by the harm suffered by her Plaintiff husband.~~

8. Upon information and belief, the Plaintiff sustained repetitive, traumatic subconcussive and/or concussive head impacts during NFL games and/or practices. Upon information and belief, Plaintiff suffers from symptoms of brain injury caused by the repetitive, traumatic sub-concussive and/or concussive head impacts the Plaintiff sustained during NFL games and/or practices. Upon information and belief, the Plaintiff's symptoms arise from injuries that are latent and have developed and continue to develop over time.

9. The original complaint by Plaintiff in this matter was filed in the Circuit Court of Cook County, Illinois on December 19, 2016. ~~If the case is remanded, it should be remanded to the Circuit Court of Cook County, Illinois.~~

10. Plaintiff claim damages as a result of [check all that apply]:

☒ Injury to Herself/Himself

- ☐ Injury to the Person Represented
- ☐ Wrongful death
- ☐ Survivorship Action
- √ Economic Loss
- √ Loss of Services
- √ Loss of Consortium

11. Plaintiff (and Plaintiff Spouse) bring this case against the following Defendants in this action [check all that apply]:

- √ Riddell, Inc.
- √ All American Sports, Inc. (d/b/a Riddell Sports Group, Inc.)
- √ Riddell Sports Group, Inc.
- √ Easton-Bell Sports, Inc.
- √ Easton-Bell Sports, LLC
- √ EB Sports Corporation
- √ RBG Holdings Corporation

12. The Plaintiff wore one or more helmets designed and/or manufactured by the Riddell Defendants during one or more years Plaintiff played in the NFL and/or AFL.

13. Plaintiff played in √ the National Football League ("NFL") and/or in and/or in the ☐ American Football League ("AFL") during the following period of time: 1976-1979 for the following teams: Detroit Lions.

14. Plaintiff retired from playing professional football after the 1979 season.

CAUSES OF ACTION

15. Plaintiff herein adopt by reference the following Counts of the Second Amended Master Administrative Long-Form Complaint, along with the factual allegations incorporated by reference in those Counts [check all that apply]:

- √ Count I (Negligence)
- √ Count II (Negligent Marketing)
- √ Count III (Negligent Misrepresentation)
- √ Count IV (Fraud)
- √ Count V (Strict Liability/Design Defect)
- √ Count VI (Failure to Warn)
- √ Count VII (Breach of Implied Warranty)
- √ Count VIII (Civil Conspiracy)
- √ Count IX (Fraudulent Concealment)
- ☐ Count X (Wrongful Death)
- ☐ Count XI (Survival Action)
- √ Count XII (Loss of Consortium)
- √ Count XIII (Punitive Damages under All Claims)
- √ Count XIV (Declaratory Relief: Punitive Damages)

PRAYER FOR RELIEF

WHEREFORE, Plaintiff (and, if applicable Plaintiff Spouse) pray for judgment as follows:

A. An award of compensatory damages, the amount of which will be determined at trial;

- B. An award of economic damages in the form of medical expenses, out of pocket expenses, lost earnings and other economic damages in an amount to be determined at trial;
- C. For punitive and exemplary damages as applicable;
- D. For all applicable statutory damages of the state whose laws will govern this action;
- E. For loss of consortium as applicable;
- F. For declaratory relief as applicable;
- G. For an award of attorneys' fees and costs;
- H. An award of prejudgment interest and costs of suit; and
- I. An award of such other and further relief as the Court deems just and proper.

JURY DEMANDED

Pursuant to Federal Rule of Civil Procedure 38, Plaintiff hereby demand a trial by jury on all issues so triable.

January 10, 2020

Respectfully Submitted:

By: /s/ William T. Gibbs

William T. Gibbs
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**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

EARNEST GRAHAM,

Plaintiff,

v.

BRG SPORTS, LLC, a corporation, f/k/a
EASTON-BELL SPORTS, LLC; EB
SPORTS CORP., a corporation; BRG
SPORTS HOLDINGS CORP., a corporation,
f/k/a RBG HOLDINGS CORP.; BRG
SPORTS, INC.; RIDDELL SPORTS
GROUP, INC.; RIDDELL, INC.; and ALL
AMERICAN SPORTS CORPORATION
(collectively "RIDDELL"),

Defendants.

MDL No. 2323

**IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION**

JURY TRIAL DEMANDED

SHORT FORM COMPLAINT

1. Plaintiff, EARNEST GRAHAM, brings this civil action as a related action in the matter entitled IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION, MDL No. 2323.

~~2. Plaintiff is filing this short form complaint as required by this Court's Case Management Order No. 7709, filed October 24, 2017.~~

3. Plaintiff (and, if applicable, Plaintiff's Spouse) continue to maintain claims against Riddell Defendants after a Class Action Settlement was entered into between the NFL Defendants and certain Plaintiffs.

4. Plaintiff (and, if applicable, Plaintiff's Spouse) incorporate by reference the allegations (as designated below) of the Second Amended Master Administrative Long-Form Complaint Against Riddell Defendants, as is fully set forth at length in this Short Form Complaint. ~~However, Plaintiff denies that there is federal subject matter jurisdiction over this action.~~

5. ~~Plaintiff is filing this case in a representative capacity as the _____ of _____, having been duly appointed as the _____ by the Court of _____.~~

6. Plaintiff, Earnest Graham, is a resident and citizen of Florida and claims damages as set forth below.

7. ~~Plaintiff's Spouse, _____ is a resident and citizen of _____, and claims damages as a result of loss of consortium proximately caused by the harm suffered by her Plaintiff husband.~~

8. Upon information and belief, the Plaintiff sustained repetitive, traumatic subconcussive and/or concussive head impacts during NFL games and/or practices. Upon information and belief, Plaintiff suffers from symptoms of brain injury caused by the repetitive, traumatic sub-concussive and/or concussive head impacts the Plaintiff sustained during NFL games and/or practices. Upon information and belief, the Plaintiff's symptoms arise from injuries that are latent and have developed and continue to develop over time.

9. The original complaint by Plaintiff in this matter was filed in the Circuit Court of Cook County, Illinois on December 19, 2016. ~~If the case is remanded, it should be remanded to the Circuit Court of Cook County, Illinois.~~

10. Plaintiff claim damages as a result of [check all that apply]:

☒ Injury to Herself/Himself

- ☐ Injury to the Person Represented
- ☐ Wrongful death
- ☐ Survivorship Action
- ☒ Economic Loss
- ☒ Loss of Services
- ☒ Loss of Consortium

11. Plaintiff (and Plaintiff Spouse) bring this case against the following Defendants in this action [check all that apply]:

- ☒ Riddell, Inc.
- ☒ All American Sports, Inc. (d/b/a Riddell Sports Group, Inc.)
- ☒ Riddell Sports Group, Inc.
- ☒ Easton-Bell Sports, Inc.
- ☒ Easton-Bell Sports, LLC
- ☒ EB Sports Corporation
- ☒ RBG Holdings Corporation

12. The Plaintiff wore one or more helmets designed and/or manufactured by the Riddell Defendants during one or more years Plaintiff played in the NFL and/or AFL.

13. Plaintiff played in ☒ the National Football League ("NFL") and/or in and/or in the ☐ American Football League ("AFL") during the following period of time: 2004-2011 for the following teams: Tampa Bay Buccaneers.

14. Plaintiff retired from playing professional football after the 2011 season.

CAUSES OF ACTION

15. Plaintiff herein adopt by reference the following Counts of the Second Amended Master Administrative Long-Form Complaint, along with the factual allegations incorporated by reference in those Counts [check all that apply]:

- √ Count I (Negligence)
- √ Count II (Negligent Marketing)
- √ Count III (Negligent Misrepresentation)
- √ Count IV (Fraud)
- √ Count V (Strict Liability/Design Defect)
- √ Count VI (Failure to Warn)
- √ Count VII (Breach of Implied Warranty)
- √ Count VIII (Civil Conspiracy)
- √ Count IX (Fraudulent Concealment)
- ☐ Count X (Wrongful Death)
- ☐ Count XI (Survival Action)
- √ Count XII (Loss of Consortium)
- √ Count XIII (Punitive Damages under All Claims)
- √ Count XIV (Declaratory Relief: Punitive Damages)

PRAYER FOR RELIEF

WHEREFORE, Plaintiff (and, if applicable Plaintiff Spouse) pray for judgment as follows:

A. An award of compensatory damages, the amount of which will be determined at trial;

- B. An award of economic damages in the form of medical expenses, out of pocket expenses, lost earnings and other economic damages in an amount to be determined at trial;
- C. For punitive and exemplary damages as applicable;
- D. For all applicable statutory damages of the state whose laws will govern this action;
- E. For loss of consortium as applicable;
- F. For declaratory relief as applicable;
- G. For an award of attorneys' fees and costs;
- H. An award of prejudgment interest and costs of suit; and
- I. An award of such other and further relief as the Court deems just and proper.

JURY DEMANDED

Pursuant to Federal Rule of Civil Procedure 38, Plaintiff hereby demand a trial by jury on all issues so triable.

January 10, 2020

Respectfully Submitted:

By: /s/ William T. Gibbs

William T. Gibbs
Corboy & Demetrio, P.C.
Attorneys for Plaintiff
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Chicago, Illinois 60602
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ARDC No. 6282949

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

WILLARD HARRELL,

Plaintiff,

v.

BRG SPORTS, LLC, a corporation, f/k/a
EASTON-BELL SPORTS, LLC; EB
SPORTS CORP., a corporation; BRG
SPORTS HOLDINGS CORP., a corporation,
f/k/a RBG HOLDINGS CORP.; BRG
SPORTS, INC.; RIDDELL SPORTS
GROUP, INC.; RIDDELL, INC.; and ALL
AMERICAN SPORTS CORPORATION
(collectively "RIDDELL"),

Defendants.

MDL No. 2323

**IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION**

JURY TRIAL DEMANDED

SHORT FORM COMPLAINT

1. Plaintiff, WILLARD HARRELL, brings this civil action as a related action in the matter entitled IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION, MDL No. 2323.

~~2. Plaintiff is filing this short form complaint as required by this Court's Case Management Order No. 7709, filed October 24, 2017.~~

3. Plaintiff (and, if applicable, Plaintiff's Spouse) continue to maintain claims against Riddell Defendants after a Class Action Settlement was entered into between the NFL Defendants and certain Plaintiffs.

4. Plaintiff (and, if applicable, Plaintiff's Spouse) incorporate by reference the allegations (as designated below) of the Second Amended Master Administrative Long-Form Complaint Against Riddell Defendants, as is fully set forth at length in this Short Form Complaint. ~~However, Plaintiff denies that there is federal subject matter jurisdiction over this action.~~

5. ~~Plaintiff is filing this case in a representative capacity as the _____ of _____, having been duly appointed as the _____ by the Court of _____.~~

6. Plaintiff, Willard Harrell, is a resident and citizen of Missouri and claims damages as set forth below.

7. ~~Plaintiffs Spouse, _____ is a resident and citizen of _____, and claims damages as a result of loss of consortium proximately caused by the harm suffered by her Plaintiff husband.~~

8. Upon information and belief, the Plaintiff sustained repetitive, traumatic subconcussive and/or concussive head impacts during NFL games and/or practices. Upon information and belief, Plaintiff suffers from symptoms of brain injury caused by the repetitive, traumatic sub-concussive and/or concussive head impacts the Plaintiff sustained during NFL games and/or practices. Upon information and belief, the Plaintiff's symptoms arise from injuries that are latent and have developed and continue to develop over time.

9. The original complaint by Plaintiff in this matter was filed in the Circuit Court of Cook County, Illinois on July 13, 2016. ~~If the case is remanded, it should be remanded to the Circuit Court of Cook County, Illinois.~~

10. Plaintiff claim damages as a result of [check all that apply]:

☒ Injury to Herself/Himself

- ☐ Injury to the Person Represented
- ☐ Wrongful death
- ☐ Survivorship Action
- ☒ Economic Loss
- ☒ Loss of Services
- ☒ Loss of Consortium

11. Plaintiff (and Plaintiff Spouse) bring this case against the following Defendants in this action [check all that apply]:

- ☒ Riddell, Inc.
- ☒ All American Sports, Inc. (d/b/a Riddell Sports Group, Inc.)
- ☒ Riddell Sports Group, Inc.
- ☒ Easton-Bell Sports, Inc.
- ☒ Easton-Bell Sports, LLC
- ☒ EB Sports Corporation
- ☒ RBG Holdings Corporation

12. The Plaintiff wore one or more helmets designed and/or manufactured by the Riddell Defendants during one or more years Plaintiff played in the NFL and/or AFL.

13. Plaintiff played in ☒ the National Football League ("NFL") and/or in and/or in the ☐ American Football League ("AFL") during the following period of time: 1975-1984 for the following teams: Green Bay Packers and St. Louis Cardinals.

14. Plaintiff retired from playing professional football after the 1984 season.

CAUSES OF ACTION

15. Plaintiff herein adopt by reference the following Counts of the Second Amended Master Administrative Long-Form Complaint, along with the factual allegations incorporated by reference in those Counts [check all that apply]:

- √ Count I (Negligence)
- √ Count II (Negligent Marketing)
- √ Count III (Negligent Misrepresentation)
- √ Count IV (Fraud)
- √ Count V (Strict Liability/Design Defect)
- √ Count VI (Failure to Warn)
- √ Count VII (Breach of Implied Warranty)
- √ Count VIII (Civil Conspiracy)
- √ Count IX (Fraudulent Concealment)
- ☐ Count X (Wrongful Death)
- ☐ Count XI (Survival Action)
- √ Count XII (Loss of Consortium)
- √ Count XIII (Punitive Damages under All Claims)
- √ Count XIV (Declaratory Relief: Punitive Damages)

PRAYER FOR RELIEF

WHEREFORE, Plaintiff (and, if applicable Plaintiff Spouse) pray for judgment as follows:

A. An award of compensatory damages, the amount of which will be determined at trial;

- B. An award of economic damages in the form of medical expenses, out of pocket expenses, lost earnings and other economic damages in an amount to be determined at trial;
- C. For punitive and exemplary damages as applicable;
- D. For all applicable statutory damages of the state whose laws will govern this action;
- E. For loss of consortium as applicable;
- F. For declaratory relief as applicable;
- G. For an award of attorneys' fees and costs;
- H. An award of prejudgment interest and costs of suit; and
- I. An award of such other and further relief as the Court deems just and proper.

JURY DEMANDED

Pursuant to Federal Rule of Civil Procedure 38, Plaintiff hereby demand a trial by jury on all issues so triable.

January 10, 2020

Respectfully Submitted:

By: /s/ William T. Gibbs

William T. Gibbs
Corboy & Demetrio, P.C.
Attorneys for Plaintiff
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ARDC No. 6282949

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ERIC HAYES,

Plaintiff,

v.

BRG SPORTS, LLC, a corporation, f/k/a
EASTON-BELL SPORTS, LLC; EB
SPORTS CORP., a corporation; BRG
SPORTS HOLDINGS CORP., a corporation,
f/k/a RBG HOLDINGS CORP.; BRG
SPORTS, INC.; RIDDELL SPORTS
GROUP, INC.; RIDDELL, INC.; and ALL
AMERICAN SPORTS CORPORATION
(collectively "RIDDELL"),

Defendants.

MDL No. 2323

**IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION**

JURY TRIAL DEMANDED

SHORT FORM COMPLAINT

1. Plaintiff, ERIC HAYES, brings this civil action as a related action in the matter entitled IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION, MDL No. 2323.

~~2. Plaintiff is filing this short form complaint as required by this Court's Case Management Order No. 7709, filed October 24, 2017.~~

3. Plaintiff (and, if applicable, Plaintiff's Spouse) continue to maintain claims against Riddell Defendants after a Class Action Settlement was entered into between the NFL Defendants and certain Plaintiffs.

4. Plaintiff (and, if applicable, Plaintiff's Spouse) incorporate by reference the allegations (as designated below) of the Second Amended Master Administrative Long-Form Complaint Against Riddell Defendants, as is fully set forth at length in this Short Form Complaint. ~~However, Plaintiff denies that there is federal subject matter jurisdiction over this action.~~

5. ~~Plaintiff is filing this case in a representative capacity as the _____ of _____, having been duly appointed as the _____ by the Court of _____.~~

6. Plaintiff, Eric Hayes, is a resident and citizen of Florida and claims damages as set forth below.

7. ~~Plaintiffs Spouse, _____ is a resident and citizen of _____, and claims damages as a result of loss of consortium proximately caused by the harm suffered by her Plaintiff husband.~~

8. Upon information and belief, the Plaintiff sustained repetitive, traumatic subconcussive and/or concussive head impacts during NFL games and/or practices. Upon information and belief, Plaintiff suffers from symptoms of brain injury caused by the repetitive, traumatic sub-concussive and/or concussive head impacts the Plaintiff sustained during NFL games and/or practices. Upon information and belief, the Plaintiff's symptoms arise from injuries that are latent and have developed and continue to develop over time.

9. The original complaint by Plaintiff in this matter was filed in the Circuit Court of Cook County, Illinois on December 19, 2016. ~~If the case is remanded, it should be remanded to the Circuit Court of Cook County, Illinois.~~

10. Plaintiff claim damages as a result of [check all that apply]:

☒ Injury to Herself/Himself

- ☐ Injury to the Person Represented
- ☐ Wrongful death
- ☐ Survivorship Action
- ☒ Economic Loss
- ☒ Loss of Services
- ☒ Loss of Consortium

11. Plaintiff (and Plaintiff Spouse) bring this case against the following Defendants in this action [check all that apply]:

- ☒ Riddell, Inc.
- ☒ All American Sports, Inc. (d/b/a Riddell Sports Group, Inc.)
- ☒ Riddell Sports Group, Inc.
- ☒ Easton-Bell Sports, Inc.
- ☒ Easton-Bell Sports, LLC
- ☒ EB Sports Corporation
- ☒ RBG Holdings Corporation

12. The Plaintiff wore one or more helmets designed and/or manufactured by the Riddell Defendants during one or more years Plaintiff played in the NFL and/or AFL.

13. Plaintiff played in ☒ the National Football League ("NFL") and/or in and/or in the ☐ American Football League ("AFL") during the following period of time: 1990-1993 for the following teams: Seattle Seahawks, Los Angeles Rams and Tampa Bay Buccaneers.

14. Plaintiff retired from playing professional football after the 1993 season.

CAUSES OF ACTION

15. Plaintiff herein adopt by reference the following Counts of the Second Amended Master Administrative Long-Form Complaint, along with the factual allegations incorporated by reference in those Counts [check all that apply]:

- √ Count I (Negligence)
- √ Count II (Negligent Marketing)
- √ Count III (Negligent Misrepresentation)
- √ Count IV (Fraud)
- √ Count V (Strict Liability/Design Defect)
- √ Count VI (Failure to Warn)
- √ Count VII (Breach of Implied Warranty)
- √ Count VIII (Civil Conspiracy)
- √ Count IX (Fraudulent Concealment)
- ☐ Count X (Wrongful Death)
- ☐ Count XI (Survival Action)
- √ Count XII (Loss of Consortium)
- √ Count XIII (Punitive Damages under All Claims)
- √ Count XIV (Declaratory Relief: Punitive Damages)

PRAYER FOR RELIEF

WHEREFORE, Plaintiff (and, if applicable Plaintiff Spouse) pray for judgment as follows:

A. An award of compensatory damages, the amount of which will be determined at trial;

- B. An award of economic damages in the form of medical expenses, out of pocket expenses, lost earnings and other economic damages in an amount to be determined at trial;
- C. For punitive and exemplary damages as applicable;
- D. For all applicable statutory damages of the state whose laws will govern this action;
- E. For loss of consortium as applicable;
- F. For declaratory relief as applicable;
- G. For an award of attorneys' fees and costs;
- H. An award of prejudgment interest and costs of suit; and
- I. An award of such other and further relief as the Court deems just and proper.

JURY DEMANDED

Pursuant to Federal Rule of Civil Procedure 38, Plaintiff hereby demand a trial by jury on all issues so triable.

January 10, 2020

Respectfully Submitted:

By: /s/ William T. Gibbs

William T. Gibbs
Corboy & Demetrio, P.C.
Attorneys for Plaintiff
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Chicago, Illinois 60602
(312) 346-3191
ccfiling@corboydemetrio.com
ARDC No. 6282949

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

EARL HOLMES,

Plaintiff,

v.

BRG SPORTS, LLC, a corporation, f/k/a
EASTON-BELL SPORTS, LLC; EB
SPORTS CORP., a corporation; BRG
SPORTS HOLDINGS CORP., a corporation,
f/k/a RBG HOLDINGS CORP.; BRG
SPORTS, INC.; RIDDELL SPORTS
GROUP, INC.; RIDDELL, INC.; and ALL
AMERICAN SPORTS CORPORATION
(collectively "RIDDELL"),

Defendants.

MDL No. 2323

**IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION**

JURY TRIAL DEMANDED

SHORT FORM COMPLAINT

1. Plaintiff, EARL HOLMES, brings this civil action as a related action in the matter entitled IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION, MDL No. 2323.

~~2. Plaintiff is filing this short form complaint as required by this Court's Case Management Order No. 7709, filed October 24, 2017.~~

3. Plaintiff (and, if applicable, Plaintiff's Spouse) continue to maintain claims against Riddell Defendants after a Class Action Settlement was entered into between the NFL Defendants and certain Plaintiffs.

4. Plaintiff (and, if applicable, Plaintiff's Spouse) incorporate by reference the allegations (as designated below) of the Second Amended Master Administrative Long-Form Complaint Against Riddell Defendants, as is fully set forth at length in this Short Form Complaint. ~~However, Plaintiff denies that there is federal subject matter jurisdiction over this action.~~

5. ~~Plaintiff is filing this case in a representative capacity as the _____ of _____, having been duly appointed as the _____ by the Court of _____.~~

6. Plaintiff, Earl Holmes, is a resident and citizen of Florida and claims damages as set forth below.

7. ~~Plaintiff's Spouse, _____ is a resident and citizen of _____, and claims damages as a result of loss of consortium proximately caused by the harm suffered by her Plaintiff husband.~~

8. Upon information and belief, the Plaintiff sustained repetitive, traumatic subconcussive and/or concussive head impacts during NFL games and/or practices. Upon information and belief, Plaintiff suffers from symptoms of brain injury caused by the repetitive, traumatic sub-concussive and/or concussive head impacts the Plaintiff sustained during NFL games and/or practices. Upon information and belief, the Plaintiff's symptoms arise from injuries that are latent and have developed and continue to develop over time.

9. The original complaint by Plaintiff in this matter was filed in the Circuit Court of Cook County, Illinois on December 19, 2016. ~~If the case is remanded, it should be remanded to the Circuit Court of Cook County, Illinois.~~

10. Plaintiff claim damages as a result of [check all that apply]:

☒ Injury to Herself/Himself

- ☐ Injury to the Person Represented
- ☐ Wrongful death
- ☐ Survivorship Action
- ☒ Economic Loss
- ☒ Loss of Services
- ☒ Loss of Consortium

11. Plaintiff (and Plaintiff Spouse) bring this case against the following Defendants in this action [check all that apply]:

- ☒ Riddell, Inc.
- ☒ All American Sports, Inc. (d/b/a Riddell Sports Group, Inc.)
- ☒ Riddell Sports Group, Inc.
- ☒ Easton-Bell Sports, Inc.
- ☒ Easton-Bell Sports, LLC
- ☒ EB Sports Corporation
- ☒ RBG Holdings Corporation

12. The Plaintiff wore one or more helmets designed and/or manufactured by the Riddell Defendants during one or more years Plaintiff played in the NFL and/or AFL.

13. Plaintiff played in ☒ the National Football League ("NFL") and/or in and/or in the ☐ American Football League ("AFL") during the following period of time: 1996-2005 for the following teams: Pittsburgh Steelers.

14. Plaintiff retired from playing professional football after the 2005 season.

CAUSES OF ACTION

15. Plaintiff herein adopt by reference the following Counts of the Second Amended Master Administrative Long-Form Complaint, along with the factual allegations incorporated by reference in those Counts [check all that apply]:

- √ Count I (Negligence)
- √ Count II (Negligent Marketing)
- √ Count III (Negligent Misrepresentation)
- √ Count IV (Fraud)
- √ Count V (Strict Liability/Design Defect)
- √ Count VI (Failure to Warn)
- √ Count VII (Breach of Implied Warranty)
- √ Count VIII (Civil Conspiracy)
- √ Count IX (Fraudulent Concealment)
- ☐ Count X (Wrongful Death)
- ☐ Count XI (Survival Action)
- √ Count XII (Loss of Consortium)
- √ Count XIII (Punitive Damages under All Claims)
- √ Count XIV (Declaratory Relief: Punitive Damages)

PRAYER FOR RELIEF

WHEREFORE, Plaintiff (and, if applicable Plaintiff Spouse) pray for judgment as follows:

A. An award of compensatory damages, the amount of which will be determined at trial;

- B. An award of economic damages in the form of medical expenses, out of pocket expenses, lost earnings and other economic damages in an amount to be determined at trial;
- C. For punitive and exemplary damages as applicable;
- D. For all applicable statutory damages of the state whose laws will govern this action;
- E. For loss of consortium as applicable;
- F. For declaratory relief as applicable;
- G. For an award of attorneys' fees and costs;
- H. An award of prejudgment interest and costs of suit; and
- I. An award of such other and further relief as the Court deems just and proper.

JURY DEMANDED

Pursuant to Federal Rule of Civil Procedure 38, Plaintiff hereby demand a trial by jury on all issues so triable.

January 10, 2020

Respectfully Submitted:

By: /s/ William T. Gibbs

William T. Gibbs
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ARDC No. 6282949

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

PAUL AND ANGLEA HORNUNG,

Plaintiffs,

v.

BRG SPORTS, LLC, a corporation, f/k/a
EASTON-BELL SPORTS, LLC; EB
SPORTS CORP., a corporation; BRG
SPORTS HOLDINGS CORP., a corporation,
f/k/a RBG HOLDINGS CORP.; BRG
SPORTS, INC.; RIDDELL SPORTS
GROUP, INC.; RIDDELL, INC.; and ALL
AMERICAN SPORTS CORPORATION
(collectively "RIDDELL"),

Defendants.

MDL No. 2323

**IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION**

JURY TRIAL DEMANDED

SHORT FORM COMPLAINT

1. Plaintiffs, PAUL AND ANGELA HORNUNG, bring this civil action as a related action in the matter entitled IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION, MDL No. 2323.

~~2. Plaintiff is filing this short form complaint as required by this Court's Case Management Order No. 7709, filed October 24, 2017.~~

3. Plaintiff (and, if applicable, Plaintiff's Spouse) continue to maintain claims against Riddell Defendants after a Class Action Settlement was entered into between the NFL Defendants and certain Plaintiffs.

4. Plaintiff (and, if applicable, Plaintiff's Spouse) incorporate by reference the allegations (as designated below) of the Second Amended Master Administrative Long-Form Complaint Against Riddell Defendants, as is fully set forth at length in this Short Form Complaint. ~~However, Plaintiff denies that there is federal subject matter jurisdiction over this action.~~

5. ~~Plaintiff is filing this case in a representative capacity as the _____ of _____, having been duly appointed as the _____ by the Court of _____.~~

6. Plaintiff, Paul Hornung, is a resident and citizen of Kentucky and claims damages as set forth below.

7. Plaintiff's Spouse, Angela Hornung, is a resident and citizen of Kentucky, and claims damages as a result of loss of consortium proximately caused by the harm suffered by her Plaintiff husband.

8. Upon information and belief, the Plaintiff sustained repetitive, traumatic subconcussive and/or concussive head impacts during NFL games and/or practices. Upon information and belief, Plaintiff suffers from symptoms of brain injury caused by the repetitive, traumatic sub-concussive and/or concussive head impacts the Plaintiff sustained during NFL games and/or practices. Upon information and belief, the Plaintiff's symptoms arise from injuries that are latent and have developed and continue to develop over time.

9. The original complaint by Plaintiffs in this matter was filed in the Circuit Court of Cook County, Illinois on July 07, 2016. ~~If the case is remanded, it should be remanded to the Circuit Court of Cook County, Illinois.~~

10. Plaintiff claim damages as a result of [check all that apply]:

☒ Injury to Herself/Himself

- ☐ Injury to the Person Represented
- ☐ Wrongful death
- ☐ Survivorship Action
- ☒ Economic Loss
- ☒ Loss of Services
- ☒ Loss of Consortium

11. Plaintiff (and Plaintiff Spouse) bring this case against the following Defendants in this action [check all that apply]:

- ☒ Riddell, Inc.
- ☒ All American Sports, Inc. (d/b/a Riddell Sports Group, Inc.)
- ☒ Riddell Sports Group, Inc.
- ☒ Easton-Bell Sports, Inc.
- ☒ Easton-Bell Sports, LLC
- ☒ EB Sports Corporation
- ☒ RBG Holdings Corporation

12. The Plaintiff wore one or more helmets designed and/or manufactured by the Riddell Defendants during one or more years Plaintiff played in the NFL and/or AFL.

13. Plaintiff played in ☒ the National Football League ("NFL") and/or in and/or in the ☐ American Football League ("AFL") during the following period of time: 1957-1966 for the following teams: Green Bay Packers and New Orleans Saints.

14. Plaintiff retired from playing professional football after the 1966 season.

CAUSES OF ACTION

15. Plaintiff herein adopt by reference the following Counts of the Second Amended Master Administrative Long-Form Complaint, along with the factual allegations incorporated by reference in those Counts [check all that apply]:

- √ Count I (Negligence)
- √ Count II (Negligent Marketing)
- √ Count III (Negligent Misrepresentation)
- √ Count IV (Fraud)
- √ Count V (Strict Liability/Design Defect)
- √ Count VI (Failure to Warn)
- √ Count VII (Breach of Implied Warranty)
- √ Count VIII (Civil Conspiracy)
- √ Count IX (Fraudulent Concealment)
- ☐ Count X (Wrongful Death)
- ☐ Count XI (Survival Action)
- √ Count XII (Loss of Consortium)
- √ Count XIII (Punitive Damages under All Claims)
- √ Count XIV (Declaratory Relief: Punitive Damages)

PRAYER FOR RELIEF

WHEREFORE, Plaintiff (and, if applicable Plaintiff Spouse) pray for judgment as follows:

A. An award of compensatory damages, the amount of which will be determined at trial;

- B. An award of economic damages in the form of medical expenses, out of pocket expenses, lost earnings and other economic damages in an amount to be determined at trial;
- C. For punitive and exemplary damages as applicable;
- D. For all applicable statutory damages of the state whose laws will govern this action;
- E. For loss of consortium as applicable;
- F. For declaratory relief as applicable;
- G. For an award of attorneys' fees and costs;
- H. An award of prejudgment interest and costs of suit; and
- I. An award of such other and further relief as the Court deems just and proper.

JURY DEMANDED

Pursuant to Federal Rule of Civil Procedure 38, Plaintiff hereby demand a trial by jury on all issues so triable.

January 10, 2020

Respectfully Submitted:

By: /s/ William T. Gibbs

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**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

DARRIEN JOHNSON,

Plaintiff,

v.

BRG SPORTS, LLC, a corporation, f/k/a
EASTON-BELL SPORTS, LLC; EB
SPORTS CORP., a corporation; BRG
SPORTS HOLDINGS CORP., a corporation,
f/k/a RBG HOLDINGS CORP.; BRG
SPORTS, INC.; RIDDELL SPORTS
GROUP, INC.; RIDDELL, INC.; and ALL
AMERICAN SPORTS CORPORATION
(collectively "RIDDELL"),

Defendants.

No. MDL No. 2323

**IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION**

JURY TRIAL DEMANDED

SHORT FORM COMPLAINT

1. Plaintiff, DARRIEN JOHNSON, brings this civil action as a related action in the matter entitled IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION, MDL No. 2323.

~~2. Plaintiff is filing this short form complaint as required by this Court's Case Management Order No. 7709, filed October 24, 2017.~~

3. Plaintiff (and, if applicable, Plaintiff's Spouse) continue to maintain claims against Riddell Defendants after a Class Action Settlement was entered into between the NFL Defendants and certain Plaintiff

4. Plaintiff (and, if applicable, Plaintiff's Spouse) incorporate by reference the allegations (as designated below) of the Second Amended Master Administrative Long-Form Complaint Against Riddell Defendants, as is fully set forth at length in this Short Form Complaint. ~~However, Plaintiff denies that there is federal subject matter jurisdiction over this action.~~

5. ~~Plaintiff is filing this case in a representative capacity as the _____ of _____, having been duly appointed as the _____ by the Court of _____.~~

6. Plaintiff, DARRIEN JOHNSON, is a resident and citizen of Illinois and claims damages as set forth below.

7. ~~Plaintiffs Spouse, _____ is a resident and citizen of _____, and claims damages as a result of loss of consortium proximately caused by the harm suffered by her Plaintiff husband.~~

8. Upon information and belief, the Plaintiff sustained repetitive, traumatic subconcussive and/or concussive head impacts during NFL games and/or practices. Upon information and belief, Plaintiff suffers from symptoms of brain injury caused by the repetitive, traumatic sub-concussive and/or concussive head impacts the Plaintiff sustained during NFL games and/or practices. Upon information and belief, the Plaintiff's symptoms arise from injuries that are latent and have developed and continue to develop over time.

9. The original complaint by Plaintiff in this matter was filed in the Circuit Court of Cook County, Illinois on January 17, 2017. ~~If the case is remanded, it should be remanded to the Circuit Court of Cook County, Illinois.~~

10. Plaintiff claim damages as a result of [check all that apply]:

☒ Injury to Herself/Himself

- ☐ Injury to the Person Represented
- ☐ Wrongful death
- ☐ Survivorship Action
- ☒ Economic Loss
- ☒ Loss of Services
- ☒ Loss of Consortium

11. Plaintiff (and Plaintiff Spouse) bring this case against the following Defendants in this action [check all that apply]:

- ☒ Riddell, Inc.
- ☒ All American Sports, Inc. (d/b/a Riddell Sports Group, Inc.)
- ☒ Riddell Sports Group, Inc.
- ☒ Easton-Bell Sports, Inc.
- ☒ Easton-Bell Sports, LLC
- ☒ EB Sports Corporation
- ☒ RBG Holdings Corporation

12. The Plaintiff wore one or more helmets designed and/or manufactured by the Riddell Defendants during one or more years Plaintiff played in the NFL and/or AFL.

13. Plaintiff played in ☒ the National Football League ("NFL") and/or in and/or in the ☐ American Football League ("AFL") during the following period of time: 2004-2006 for the following teams: New York Jets.

14. Plaintiff retired from playing professional football after the 2006 season.

CAUSES OF ACTION

15. Plaintiff herein adopt by reference the following Counts of the Second Amended Master Administrative Long-Form Complaint, along with the factual allegations incorporated by reference in those Counts [check all that apply]:

- √ Count I (Negligence)
- √ Count II (Negligent Marketing)
- √ Count III (Negligent Misrepresentation)
- √ Count IV (Fraud)
- √ Count V (Strict Liability/Design Defect)
- √ Count VI (Failure to Warn)
- √ Count VII (Breach of Implied Warranty)
- √ Count VIII (Civil Conspiracy)
- √ Count IX (Fraudulent Concealment)
- ☐ Count X (Wrongful Death)
- ☐ Count XI (Survival Action)
- √ Count XII (Loss of Consortium)
- √ Count XIII (Punitive Damages under All Claims)
- √ Count XIV (Declaratory Relief: Punitive Damages)

PRAYER FOR RELIEF

WHEREFORE, Plaintiff (and, if applicable Plaintiff Spouse) pray for judgment as follows:

- A. An award of compensatory damages, the amount of which will be determined at trial;
- B. An award of economic damages in the form of medical expenses, out of pocket expenses, lost earnings and other economic damages in an amount to be determined at trial;
- C. For punitive and exemplary damages as applicable;
- D. For all applicable statutory damages of the state whose laws will govern this action;
- E. For loss of consortium as applicable;
- F. For declaratory relief as applicable;
- G. For an award of attorneys' fees and costs;
- H. An award of prejudgment interest and costs of suit; and
- I. An award of such other and further relief as the Court deems just and proper.

JURY DEMANDED

Pursuant to Federal Rule of Civil Procedure 38, Plaintiff hereby demand a trial by jury on all issues so triable.

January 10, 2020

Respectfully Submitted:

By: /s/ William T. Gibbs

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**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

DANNIE LOCKETT,

Plaintiff,

v.

BRG SPORTS, LLC, a corporation, f/k/a
EASTON-BELL SPORTS, LLC; EB
SPORTS CORP., a corporation; BRG
SPORTS HOLDINGS CORP., a corporation,
f/k/a RBG HOLDINGS CORP.; BRG
SPORTS, INC.; RIDDELL SPORTS
GROUP, INC.; RIDDELL, INC.; and ALL
AMERICAN SPORTS CORPORATION
(collectively "RIDDELL"),

Defendants.

MDL No. 2323

**IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION**

JURY TRIAL DEMANDED

SHORT FORM COMPLAINT

1. Plaintiff, DANNIE LOCKETT, brings this civil action as a related action in the matter entitled IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION, MDL No. 2323.

~~2. Plaintiff is filing this short form complaint as required by this Court's Case Management Order No. 7709, filed October 24, 2017.~~

3. Plaintiff (and, if applicable, Plaintiff's Spouse) continue to maintain claims against Riddell Defendants after a Class Action Settlement was entered into between the NFL Defendants and certain Plaintiffs.

4. Plaintiff (and, if applicable, Plaintiff's Spouse) incorporate by reference the allegations (as designated below) of the Second Amended Master Administrative Long-Form Complaint Against Riddell Defendants, as is fully set forth at length in this Short Form Complaint. ~~However, Plaintiff denies that there is federal subject matter jurisdiction over this action.~~

5. ~~Plaintiff is filing this case in a representative capacity as the _____ of _____, having been duly appointed as the _____ by the Court of _____.~~

6. Plaintiff, Dannie Lockett, is a resident and citizen of Georgia and claims damages as set forth below.

7. ~~Plaintiffs Spouse, _____ is a resident and citizen of _____, and claims damages as a result of loss of consortium proximately caused by the harm suffered by her Plaintiff husband.~~

8. Upon information and belief, the Plaintiff sustained repetitive, traumatic subconcussive and/or concussive head impacts during NFL games and/or practices. Upon information and belief, Plaintiff suffers from symptoms of brain injury caused by the repetitive, traumatic sub-concussive and/or concussive head impacts the Plaintiff sustained during NFL games and/or practices. Upon information and belief, the Plaintiff's symptoms arise from injuries that are latent and have developed and continue to develop over time.

9. The original complaint by Plaintiff in this matter was filed in the Circuit Court of Cook County, Illinois on December 19, 2016. ~~If the case is remanded, it should be remanded to the Circuit Court of Cook County, Illinois.~~

10. Plaintiff claim damages as a result of [check all that apply]:

☒ Injury to Herself/Himself

- ☐ Injury to the Person Represented
- ☐ Wrongful death
- ☐ Survivorship Action
- ☒ Economic Loss
- ☒ Loss of Services
- ☒ Loss of Consortium

11. Plaintiff (and Plaintiff Spouse) bring this case against the following Defendants in this action [check all that apply]:

- ☒ Riddell, Inc.
- ☒ All American Sports, Inc. (d/b/a Riddell Sports Group, Inc.)
- ☒ Riddell Sports Group, Inc.
- ☒ Easton-Bell Sports, Inc.
- ☒ Easton-Bell Sports, LLC
- ☒ EB Sports Corporation
- ☒ RBG Holdings Corporation

12. The Plaintiff wore one or more helmets designed and/or manufactured by the Riddell Defendants during one or more years Plaintiff played in the NFL and/or AFL.

13. Plaintiff played in ☒ the National Football League ("NFL") and/or in and/or in the ☐ American Football League ("AFL") during the following period of time: 1987-1988 for the following teams: Detroit Lions.

14. Plaintiff retired from playing professional football after the 1988 season.

CAUSES OF ACTION

15. Plaintiff herein adopt by reference the following Counts of the Second Amended Master Administrative Long-Form Complaint, along with the factual allegations incorporated by reference in those Counts [check all that apply]:

- √ Count I (Negligence)
- √ Count II (Negligent Marketing)
- √ Count III (Negligent Misrepresentation)
- √ Count IV (Fraud)
- √ Count V (Strict Liability/Design Defect)
- √ Count VI (Failure to Warn)
- √ Count VII (Breach of Implied Warranty)
- √ Count VIII (Civil Conspiracy)
- √ Count IX (Fraudulent Concealment)
- ☐ Count X (Wrongful Death)
- ☐ Count XI (Survival Action)
- √ Count XII (Loss of Consortium)
- √ Count XIII (Punitive Damages under All Claims)
- √ Count XIV (Declaratory Relief: Punitive Damages)

PRAYER FOR RELIEF

WHEREFORE, Plaintiff (and, if applicable Plaintiff Spouse) pray for judgment as follows:

A. An award of compensatory damages, the amount of which will be determined at trial;

- B. An award of economic damages in the form of medical expenses, out of pocket expenses, lost earnings and other economic damages in an amount to be determined at trial;
- C. For punitive and exemplary damages as applicable;
- D. For all applicable statutory damages of the state whose laws will govern this action;
- E. For loss of consortium as applicable;
- F. For declaratory relief as applicable;
- G. For an award of attorneys' fees and costs;
- H. An award of prejudgment interest and costs of suit; and
- I. An award of such other and further relief as the Court deems just and proper.

JURY DEMANDED

Pursuant to Federal Rule of Civil Procedure 38, Plaintiff hereby demand a trial by jury on all issues so triable.

January 10, 2020

Respectfully Submitted:

By: /s/ William T. Gibbs

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ARDC No. 6282949

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

DENNIS LUNDY,

Plaintiff,

v.

BRG SPORTS, LLC, a corporation, f/k/a
EASTON-BELL SPORTS, LLC; EB
SPORTS CORP., a corporation; BRG
SPORTS HOLDINGS CORP., a corporation,
f/k/a RBG HOLDINGS CORP.; BRG
SPORTS, INC.; RIDDELL SPORTS
GROUP, INC.; RIDDELL, INC.; and ALL
AMERICAN SPORTS CORPORATION
(collectively "RIDDELL"),

Defendants.

MDL No. 2323

**IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION**

JURY TRIAL DEMANDED

SHORT FORM COMPLAINT

1. Plaintiff, DENNIS LUNDY, brings this civil action as a related action in the matter entitled IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION, MDL No. 2323.

~~2. Plaintiff is filing this short form complaint as required by this Court's Case Management Order No. 7709, filed October 24, 2017.~~

3. Plaintiff (and, if applicable, Plaintiff's Spouse) continue to maintain claims against Riddell Defendants after a Class Action Settlement was entered into between the NFL Defendants and certain Plaintiffs.

4. Plaintiff (and, if applicable, Plaintiff's Spouse) incorporate by reference the allegations (as designated below) of the Second Amended Master Administrative Long-Form Complaint Against Riddell Defendants, as is fully set forth at length in this Short Form Complaint. ~~However, Plaintiff denies that there is federal subject matter jurisdiction over this action.~~

5. ~~Plaintiff is filing this case in a representative capacity as the _____ of _____, having been duly appointed as the _____ by the Court of _____.~~

6. Plaintiff, Dennis Lundy, is a resident and citizen of Florida and claims damages as set forth below.

7. ~~Plaintiffs Spouse, _____ is a resident and citizen of _____, and claims damages as a result of loss of consortium proximately caused by the harm suffered by her Plaintiff husband.~~

8. Upon information and belief, the Plaintiff sustained repetitive, traumatic subconcussive and/or concussive head impacts during NFL games and/or practices. Upon information and belief, Plaintiff suffers from symptoms of brain injury caused by the repetitive, traumatic sub-concussive and/or concussive head impacts the Plaintiff sustained during NFL games and/or practices. Upon information and belief, the Plaintiff's symptoms arise from injuries that are latent and have developed and continue to develop over time.

9. The original complaint by Plaintiff in this matter was filed in the Circuit Court of Cook County, Illinois on August 25, 2016. ~~If the case is remanded, it should be remanded to the Circuit Court of Cook County, Illinois.~~

10. Plaintiff claim damages as a result of [check all that apply]:

☒ Injury to Herself/Himself

☐ Injury to the Person Represented

☐ Wrongful death

☐ Survivorship Action

☒ Economic Loss

☒ Loss of Services

☒ Loss of Consortium

11. Plaintiff (and Plaintiff Spouse) bring this case against the following Defendants in this action [check all that apply]:

☒ Riddell, Inc.

☒ All American Sports, Inc. (d/b/a Riddell Sports Group, Inc.)

☒ Riddell Sports Group, Inc.

☒ Easton-Bell Sports, Inc.

☒ Easton-Bell Sports, LLC

☒ EB Sports Corporation

☒ RBG Holdings Corporation

12. The Plaintiff wore one or more helmets designed and/or manufactured by the Riddell Defendants during one or more years Plaintiff played in the NFL and/or AFL.

13. Plaintiff played in ☒ the National Football League ("NFL") and/or in and/or in the ☐ American Football League ("AFL") during the following period of time: 1995-1995 for the following teams: Houston Oilers and Chicago Bears.

14. Plaintiff retired from playing professional football after the 1995 season.

CAUSES OF ACTION

15. Plaintiff herein adopt by reference the following Counts of the Second Amended Master Administrative Long-Form Complaint, along with the factual allegations incorporated by reference in those Counts [check all that apply]:

- √ Count I (Negligence)
- √ Count II (Negligent Marketing)
- √ Count III (Negligent Misrepresentation)
- √ Count IV (Fraud)
- √ Count V (Strict Liability/Design Defect)
- √ Count VI (Failure to Warn)
- √ Count VII (Breach of Implied Warranty)
- √ Count VIII (Civil Conspiracy)
- √ Count IX (Fraudulent Concealment)
- ☐ Count X (Wrongful Death)
- ☐ Count XI (Survival Action)
- √ Count XII (Loss of Consortium)
- √ Count XIII (Punitive Damages under All Claims)
- √ Count XIV (Declaratory Relief: Punitive Damages)

PRAYER FOR RELIEF

WHEREFORE, Plaintiff (and, if applicable Plaintiff Spouse) pray for judgment as follows:

A. An award of compensatory damages, the amount of which will be determined at trial;

- B. An award of economic damages in the form of medical expenses, out of pocket expenses, lost earnings and other economic damages in an amount to be determined at trial;
- C. For punitive and exemplary damages as applicable;
- D. For all applicable statutory damages of the state whose laws will govern this action;
- E. For loss of consortium as applicable;
- F. For declaratory relief as applicable;
- G. For an award of attorneys' fees and costs;
- H. An award of prejudgment interest and costs of suit; and
- I. An award of such other and further relief as the Court deems just and proper.

JURY DEMANDED

Pursuant to Federal Rule of Civil Procedure 38, Plaintiff hereby demand a trial by jury on all issues so triable.

January 10, 2020

Respectfully Submitted:

By: /s/ William T. Gibbs

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ARDC No. 6282949

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

FRED MCCALLISTER,

Plaintiff,

v.

BRG SPORTS, LLC, a corporation, f/k/a
EASTON-BELL SPORTS, LLC; EB
SPORTS CORP., a corporation; BRG
SPORTS HOLDINGS CORP., a corporation,
f/k/a RBG HOLDINGS CORP.; BRG
SPORTS, INC.; RIDDELL SPORTS
GROUP, INC.; RIDDELL, INC.; and ALL
AMERICAN SPORTS CORPORATION
(collectively "RIDDELL"),

Defendants.

MDL No. 2323

**IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION**

JURY TRIAL DEMANDED

SHORT FORM COMPLAINT

1. Plaintiff, FRED MCCALLISTER, brings this civil action as a related action in the matter entitled IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION, MDL No. 2323.

~~2. Plaintiff is filing this short form complaint as required by this Court's Case Management Order No. 7709, filed October 24, 2017.~~

3. Plaintiff (and, if applicable, Plaintiff's Spouse) continue to maintain claims against Riddell Defendants after a Class Action Settlement was entered into between the NFL Defendants and certain Plaintiffs.

4. Plaintiff (and, if applicable, Plaintiff's Spouse) incorporate by reference the allegations (as designated below) of the Second Amended Master Administrative Long-Form Complaint Against Riddell Defendants, as is fully set forth at length in this Short Form Complaint. ~~However, Plaintiff denies that there is federal subject matter jurisdiction over this action.~~

5. ~~Plaintiff is filing this case in a representative capacity as the _____ of _____, having been duly appointed as the _____ by the Court of _____.~~

6. Plaintiff, Fred McCallister, is a resident and citizen of Florida and claims damages as set forth below.

7. ~~Plaintiffs Spouse, _____ is a resident and citizen of _____, and claims damages as a result of loss of consortium proximately caused by the harm suffered by her Plaintiff husband.~~

8. Upon information and belief, the Plaintiff sustained repetitive, traumatic subconcussive and/or concussive head impacts during NFL games and/or practices. Upon information and belief, Plaintiff suffers from symptoms of brain injury caused by the repetitive, traumatic sub-concussive and/or concussive head impacts the Plaintiff sustained during NFL games and/or practices. Upon information and belief, the Plaintiff's symptoms arise from injuries that are latent and have developed and continue to develop over time.

9. The original complaint by Plaintiff in this matter was filed in the Circuit Court of Cook County, Illinois on August 25, 2016. ~~If the case is remanded, it should be remanded to the Circuit Court of Cook County, Illinois.~~

10. Plaintiff claim damages as a result of [check all that apply]:

☒ Injury to Herself/Himself

- ☐ Injury to the Person Represented
- ☐ Wrongful death
- ☐ Survivorship Action
- √ Economic Loss
- √ Loss of Services
- √ Loss of Consortium

11. Plaintiff (and Plaintiff Spouse) bring this case against the following Defendants in this action [check all that apply]:

- √ Riddell, Inc.
- √ All American Sports, Inc. (d/b/a Riddell Sports Group, Inc.)
- √ Riddell Sports Group, Inc.
- √ Easton-Bell Sports, Inc.
- √ Easton-Bell Sports, LLC
- √ EB Sports Corporation
- √ RBG Holdings Corporation

12. The Plaintiff wore one or more helmets designed and/or manufactured by the Riddell Defendants during one or more years Plaintiff played in the NFL and/or AFL.

13. Plaintiff played in √ the National Football League ("NFL") and/or in and/or in the ☐ American Football League ("AFL") during the following period of time: 1987-1987 for the following teams: Tampa Bay Buccaneers.

14. Plaintiff retired from playing professional football after the 1987 season.

CAUSES OF ACTION

15. Plaintiff herein adopt by reference the following Counts of the Second Amended Master Administrative Long-Form Complaint, along with the factual allegations incorporated by reference in those Counts [check all that apply]:

- √ Count I (Negligence)
- √ Count II (Negligent Marketing)
- √ Count III (Negligent Misrepresentation)
- √ Count IV (Fraud)
- √ Count V (Strict Liability/Design Defect)
- √ Count VI (Failure to Warn)
- √ Count VII (Breach of Implied Warranty)
- √ Count VIII (Civil Conspiracy)
- √ Count IX (Fraudulent Concealment)
- ☐ Count X (Wrongful Death)
- ☐ Count XI (Survival Action)
- √ Count XII (Loss of Consortium)
- √ Count XIII (Punitive Damages under All Claims)
- √ Count XIV (Declaratory Relief: Punitive Damages)

PRAYER FOR RELIEF

WHEREFORE, Plaintiff (and, if applicable Plaintiff Spouse) pray for judgment as follows:

A. An award of compensatory damages, the amount of which will be determined at trial;

- B. An award of economic damages in the form of medical expenses, out of pocket expenses, lost earnings and other economic damages in an amount to be determined at trial;
- C. For punitive and exemplary damages as applicable;
- D. For all applicable statutory damages of the state whose laws will govern this action;
- E. For loss of consortium as applicable;
- F. For declaratory relief as applicable;
- G. For an award of attorneys' fees and costs;
- H. An award of prejudgment interest and costs of suit; and
- I. An award of such other and further relief as the Court deems just and proper.

JURY DEMANDED

Pursuant to Federal Rule of Civil Procedure 38, Plaintiff hereby demand a trial by jury on all issues so triable.

January 10, 2020

Respectfully Submitted:

By: /s/ William T. Gibbs

William T. Gibbs
Corboy & Demetrio, P.C.
Attorneys for Plaintiff
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ARDC No. 6282949

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

DWIGHT MCDONALD,

Plaintiff,

v.

BRG SPORTS, LLC, a corporation, f/k/a
EASTON-BELL SPORTS, LLC; EB
SPORTS CORP., a corporation; BRG
SPORTS HOLDINGS CORP., a corporation,
f/k/a RBG HOLDINGS CORP.; BRG
SPORTS, INC.; RIDDELL SPORTS
GROUP, INC.; RIDDELL, INC.; and ALL
AMERICAN SPORTS CORPORATION
(collectively "RIDDELL"),

Defendants.

MDL No. 2323

**IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION**

JURY TRIAL DEMANDED

SHORT FORM COMPLAINT

1. Plaintiff, DWIGHT MCDONALD, brings this civil action as a related action in the matter entitled IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION, MDL No. 2323.

~~2. Plaintiff is filing this short form complaint as required by this Court's Case Management Order No. 7709, filed October 24, 2017.~~

3. Plaintiff (and, if applicable, Plaintiff's Spouse) continue to maintain claims against Riddell Defendants after a Class Action Settlement was entered into between the NFL Defendants and certain Plaintiffs.

4. Plaintiff (and, if applicable, Plaintiff's Spouse) incorporate by reference the allegations (as designated below) of the Second Amended Master Administrative Long-Form Complaint Against Riddell Defendants, as is fully set forth at length in this Short Form Complaint. ~~However, Plaintiff denies that there is federal subject matter jurisdiction over this action.~~

5. ~~Plaintiff is filing this case in a representative capacity as the _____ of _____, having been duly appointed as the _____ by the Court of _____.~~

6. Plaintiff, Dwight McDonald, is a resident and citizen of California and claims damages as set forth below.

7. ~~Plaintiffs Spouse, _____ is a resident and citizen of _____, and claims damages as a result of loss of consortium proximately caused by the harm suffered by her Plaintiff husband.~~

8. Upon information and belief, the Plaintiff sustained repetitive, traumatic subconcussive and/or concussive head impacts during NFL games and/or practices. Upon information and belief, Plaintiff suffers from symptoms of brain injury caused by the repetitive, traumatic sub-concussive and/or concussive head impacts the Plaintiff sustained during NFL games and/or practices. Upon information and belief, the Plaintiff's symptoms arise from injuries that are latent and have developed and continue to develop over time.

9. The original complaint by Plaintiff in this matter was filed in the Circuit Court of Cook County, Illinois on December 19, 2016. ~~If the case is remanded, it should be remanded to the Circuit Court of Cook County, Illinois.~~

10. Plaintiff claim damages as a result of [check all that apply]:

☒ Injury to Herself/Himself

- ☐ Injury to the Person Represented
- ☐ Wrongful death
- ☐ Survivorship Action
- ☒ Economic Loss
- ☒ Loss of Services
- ☒ Loss of Consortium

11. Plaintiff (and Plaintiff Spouse) bring this case against the following Defendants in this action [check all that apply]:

- ☒ Riddell, Inc.
- ☒ All American Sports, Inc. (d/b/a Riddell Sports Group, Inc.)
- ☒ Riddell Sports Group, Inc.
- ☒ Easton-Bell Sports, Inc.
- ☒ Easton-Bell Sports, LLC
- ☒ EB Sports Corporation
- ☒ RBG Holdings Corporation

12. The Plaintiff wore one or more helmets designed and/or manufactured by the Riddell Defendants during one or more years Plaintiff played in the NFL and/or AFL.

13. Plaintiff played in ☒ the National Football League ("NFL") and/or in and/or in the ☐ American Football League ("AFL") during the following period of time: 1975-1978 for the following teams: San Diego Chargers.

14. Plaintiff retired from playing professional football after the 1978 season.

CAUSES OF ACTION

15. Plaintiff herein adopt by reference the following Counts of the Second Amended Master Administrative Long-Form Complaint, along with the factual allegations incorporated by reference in those Counts [check all that apply]:

- √ Count I (Negligence)
- √ Count II (Negligent Marketing)
- √ Count III (Negligent Misrepresentation)
- √ Count IV (Fraud)
- √ Count V (Strict Liability/Design Defect)
- √ Count VI (Failure to Warn)
- √ Count VII (Breach of Implied Warranty)
- √ Count VIII (Civil Conspiracy)
- √ Count IX (Fraudulent Concealment)
- ☐ Count X (Wrongful Death)
- ☐ Count XI (Survival Action)
- √ Count XII (Loss of Consortium)
- √ Count XIII (Punitive Damages under All Claims)
- √ Count XIV (Declaratory Relief: Punitive Damages)

PRAYER FOR RELIEF

WHEREFORE, Plaintiff (and, if applicable Plaintiff Spouse) pray for judgment as follows:

A. An award of compensatory damages, the amount of which will be determined at trial;

- B. An award of economic damages in the form of medical expenses, out of pocket expenses, lost earnings and other economic damages in an amount to be determined at trial;
- C. For punitive and exemplary damages as applicable;
- D. For all applicable statutory damages of the state whose laws will govern this action;
- E. For loss of consortium as applicable;
- F. For declaratory relief as applicable;
- G. For an award of attorneys' fees and costs;
- H. An award of prejudgment interest and costs of suit; and
- I. An award of such other and further relief as the Court deems just and proper.

JURY DEMANDED

Pursuant to Federal Rule of Civil Procedure 38, Plaintiff hereby demand a trial by jury on all issues so triable.

January 10, 2020

Respectfully Submitted:

By: /s/ William T. Gibbs

William T. Gibbs
Corboy & Demetrio, P.C.
Attorneys for Plaintiff
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ARDC No. 6282949

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

TYRONE MCKENZIE,

Plaintiff,

v.

BRG SPORTS, LLC, a corporation, f/k/a
EASTON-BELL SPORTS, LLC; EB
SPORTS CORP., a corporation; BRG
SPORTS HOLDINGS CORP., a corporation,
f/k/a RBG HOLDINGS CORP.; BRG
SPORTS, INC.; RIDDELL SPORTS
GROUP, INC.; RIDDELL, INC.; and ALL
AMERICAN SPORTS CORPORATION
(collectively "RIDDELL"),

Defendants.

MDL No. 2323

**IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION**

JURY TRIAL DEMANDED

SHORT FORM COMPLAINT

1. Plaintiff, TYRONE MCKENZIE, brings this civil action as a related action in the matter entitled IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION, MDL No. 2323.

~~2. Plaintiff is filing this short form complaint as required by this Court's Case Management Order No. 7709, filed October 24, 2017.~~

3. Plaintiff (and, if applicable, Plaintiff's Spouse) continue to maintain claims against Riddell Defendants after a Class Action Settlement was entered into between the NFL Defendants and certain Plaintiffs.

4. Plaintiff (and, if applicable, Plaintiff's Spouse) incorporate by reference the allegations (as designated below) of the Second Amended Master Administrative Long-Form Complaint Against Riddell Defendants, as is fully set forth at length in this Short Form Complaint. ~~However, Plaintiff denies that there is federal subject matter jurisdiction over this action.~~

5. ~~Plaintiff is filing this case in a representative capacity as the _____ of _____, having been duly appointed as the _____ by the Court of _____.~~

6. Plaintiff, Tyrone McKenzie, is a resident and citizen of Tennessee and claims damages as set forth below.

7. ~~Plaintiffs Spouse, _____ is a resident and citizen of _____, and claims damages as a result of loss of consortium proximately caused by the harm suffered by her Plaintiff husband.~~

8. Upon information and belief, the Plaintiff sustained repetitive, traumatic subconcussive and/or concussive head impacts during NFL games and/or practices. Upon information and belief, Plaintiff suffers from symptoms of brain injury caused by the repetitive, traumatic sub-concussive and/or concussive head impacts the Plaintiff sustained during NFL games and/or practices. Upon information and belief, the Plaintiff's symptoms arise from injuries that are latent and have developed and continue to develop over time.

9. The original complaint by Plaintiff in this matter was filed in the Circuit Court of Cook County, Illinois on December 19, 2016. ~~If the case is remanded, it should be remanded to the Circuit Court of Cook County, Illinois.~~

10. Plaintiff claim damages as a result of [check all that apply]:

☒ Injury to Herself/Himself

- ☐ Injury to the Person Represented
- ☐ Wrongful death
- ☐ Survivorship Action
- ☒ Economic Loss
- ☒ Loss of Services
- ☒ Loss of Consortium

11. Plaintiff (and Plaintiff Spouse) bring this case against the following Defendants in this action [check all that apply]:

- ☒ Riddell, Inc.
- ☒ All American Sports, Inc. (d/b/a Riddell Sports Group, Inc.)
- ☒ Riddell Sports Group, Inc.
- ☒ Easton-Bell Sports, Inc.
- ☒ Easton-Bell Sports, LLC
- ☒ EB Sports Corporation
- ☒ RBG Holdings Corporation

12. The Plaintiff wore one or more helmets designed and/or manufactured by the Riddell Defendants during one or more years Plaintiff played in the NFL and/or AFL.

13. Plaintiff played in ☒ the National Football League ("NFL") and/or in and/or in the ☐ American Football League ("AFL") during the following period of time: 2009-2012 for the following teams: New England Patriots, Tampa Bay Buccaneers and Minnesota Vikings.

14. Plaintiff retired from playing professional football after the 2012 season.

CAUSES OF ACTION

15. Plaintiff herein adopt by reference the following Counts of the Second Amended Master Administrative Long-Form Complaint, along with the factual allegations incorporated by reference in those Counts [check all that apply]:

- √ Count I (Negligence)
- √ Count II (Negligent Marketing)
- √ Count III (Negligent Misrepresentation)
- √ Count IV (Fraud)
- √ Count V (Strict Liability/Design Defect)
- √ Count VI (Failure to Warn)
- √ Count VII (Breach of Implied Warranty)
- √ Count VIII (Civil Conspiracy)
- √ Count IX (Fraudulent Concealment)
- ☐ Count X (Wrongful Death)
- ☐ Count XI (Survival Action)
- √ Count XII (Loss of Consortium)
- √ Count XIII (Punitive Damages under All Claims)
- √ Count XIV (Declaratory Relief: Punitive Damages)

PRAYER FOR RELIEF

WHEREFORE, Plaintiff (and, if applicable Plaintiff Spouse) pray for judgment as follows:

A. An award of compensatory damages, the amount of which will be determined at trial;

- B. An award of economic damages in the form of medical expenses, out of pocket expenses, lost earnings and other economic damages in an amount to be determined at trial;
- C. For punitive and exemplary damages as applicable;
- D. For all applicable statutory damages of the state whose laws will govern this action;
- E. For loss of consortium as applicable;
- F. For declaratory relief as applicable;
- G. For an award of attorneys' fees and costs;
- H. An award of prejudgment interest and costs of suit; and
- I. An award of such other and further relief as the Court deems just and proper.

JURY DEMANDED

Pursuant to Federal Rule of Civil Procedure 38, Plaintiff hereby demand a trial by jury on all issues so triable.

January 10, 2020

Respectfully Submitted:

By: /s/ William T. Gibbs

William T. Gibbs
Corboy & Demetrio, P.C.
Attorneys for Plaintiff
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(312) 346-3191
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ARDC No. 6282949

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MARK MCMILLIAN,

Plaintiff,

v.

BRG SPORTS, LLC, a corporation, f/k/a
EASTON-BELL SPORTS, LLC; EB
SPORTS CORP., a corporation; BRG
SPORTS HOLDINGS CORP., a corporation,
f/k/a RBG HOLDINGS CORP.; BRG
SPORTS, INC.; RIDDELL SPORTS
GROUP, INC.; RIDDELL, INC.; and ALL
AMERICAN SPORTS CORPORATION
(collectively "RIDDELL"),

Defendants.

MDL No. 2323

**IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION**

JURY TRIAL DEMANDED

SHORT FORM COMPLAINT

1. Plaintiff, MARK MCMILLIAN, brings this civil action as a related action in the matter entitled IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION, MDL No. 2323.

~~2. Plaintiff is filing this short form complaint as required by this Court's Case Management Order No. 7709, filed October 24, 2017.~~

3. Plaintiff (and, if applicable, Plaintiff's Spouse) continue to maintain claims against Riddell Defendants after a Class Action Settlement was entered into between the NFL Defendants and certain Plaintiffs.

4. Plaintiff (and, if applicable, Plaintiff's Spouse) incorporate by reference the allegations (as designated below) of the Second Amended Master Administrative Long-Form Complaint Against Riddell Defendants, as is fully set forth at length in this Short Form Complaint. ~~However, Plaintiff denies that there is federal subject matter jurisdiction over this action.~~

5. ~~Plaintiff is filing this case in a representative capacity as the _____ of _____, having been duly appointed as the _____ by the Court of _____.~~

6. Plaintiff, Mark McMillian, is a resident and citizen of Arizona and claims damages as set forth below.

7. ~~Plaintiffs Spouse, _____ is a resident and citizen of _____, and claims damages as a result of loss of consortium proximately caused by the harm suffered by her Plaintiff husband.~~

8. Upon information and belief, the Plaintiff sustained repetitive, traumatic subconcussive and/or concussive head impacts during NFL games and/or practices. Upon information and belief, Plaintiff suffers from symptoms of brain injury caused by the repetitive, traumatic sub-concussive and/or concussive head impacts the Plaintiff sustained during NFL games and/or practices. Upon information and belief, the Plaintiff's symptoms arise from injuries that are latent and have developed and continue to develop over time.

9. The original complaint by Plaintiff in this matter was filed in the Circuit Court of Cook County, Illinois on August 25, 2016. ~~If the case is remanded, it should be remanded to the Circuit Court of Cook County, Illinois.~~

10. Plaintiff claim damages as a result of [check all that apply]:

☒ Injury to Herself/Himself

- ☐ Injury to the Person Represented
- ☐ Wrongful death
- ☐ Survivorship Action
- ☒ Economic Loss
- ☒ Loss of Services
- ☒ Loss of Consortium

11. Plaintiff (and Plaintiff Spouse) bring this case against the following Defendants in this action [check all that apply]:

- ☒ Riddell, Inc.
- ☒ All American Sports, Inc. (d/b/a Riddell Sports Group, Inc.)
- ☒ Riddell Sports Group, Inc.
- ☒ Easton-Bell Sports, Inc.
- ☒ Easton-Bell Sports, LLC
- ☒ EB Sports Corporation
- ☒ RBG Holdings Corporation

12. The Plaintiff wore one or more helmets designed and/or manufactured by the Riddell Defendants during one or more years Plaintiff played in the NFL and/or AFL.

13. Plaintiff played in ☒ the National Football League ("NFL") and/or in and/or in the ☐ American Football League ("AFL") during the following period of time: 1992-1999 for the following teams: Philadelphia Eagles, New Orleans Saints, Kansas City Chiefs, San Francisco 49ers and Washington Redskins.

14. Plaintiff retired from playing professional football after the 1999 season.

CAUSES OF ACTION

15. Plaintiff herein adopt by reference the following Counts of the Second Amended Master Administrative Long-Form Complaint, along with the factual allegations incorporated by reference in those Counts [check all that apply]:

- √ Count I (Negligence)
- √ Count II (Negligent Marketing)
- √ Count III (Negligent Misrepresentation)
- √ Count IV (Fraud)
- √ Count V (Strict Liability/Design Defect)
- √ Count VI (Failure to Warn)
- √ Count VII (Breach of Implied Warranty)
- √ Count VIII (Civil Conspiracy)
- √ Count IX (Fraudulent Concealment)
- ☐ Count X (Wrongful Death)
- ☐ Count XI (Survival Action)
- √ Count XII (Loss of Consortium)
- √ Count XIII (Punitive Damages under All Claims)
- √ Count XIV (Declaratory Relief: Punitive Damages)

PRAYER FOR RELIEF

WHEREFORE, Plaintiff (and, if applicable Plaintiff Spouse) pray for judgment as follows:

A. An award of compensatory damages, the amount of which will be determined at trial;

- B. An award of economic damages in the form of medical expenses, out of pocket expenses, lost earnings and other economic damages in an amount to be determined at trial;
- C. For punitive and exemplary damages as applicable;
- D. For all applicable statutory damages of the state whose laws will govern this action;
- E. For loss of consortium as applicable;
- F. For declaratory relief as applicable;
- G. For an award of attorneys' fees and costs;
- H. An award of prejudgment interest and costs of suit; and
- I. An award of such other and further relief as the Court deems just and proper.

JURY DEMANDED

Pursuant to Federal Rule of Civil Procedure 38, Plaintiff hereby demand a trial by jury on all issues so triable.

January 10, 2020

Respectfully Submitted:

By: /s/ William T. Gibbs

William T. Gibbs
Corboy & Demetrio, P.C.
Attorneys for Plaintiff
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Chicago, Illinois 60602
(312) 346-3191
ccfiling@corboydemetrio.com
ARDC No. 6282949

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

FRANK MURPHY,

Plaintiff,

v.

BRG SPORTS, LLC, a corporation, f/k/a
EASTON-BELL SPORTS, LLC; EB
SPORTS CORP., a corporation; BRG
SPORTS HOLDINGS CORP., a corporation,
f/k/a RBG HOLDINGS CORP.; BRG
SPORTS, INC.; RIDDELL SPORTS
GROUP, INC.; RIDDELL, INC.; and ALL
AMERICAN SPORTS CORPORATION
(collectively "RIDDELL"),

Defendants.

MDL No. 2323

**IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION**

JURY TRIAL DEMANDED

SHORT FORM COMPLAINT

1. Plaintiff, FRANK MURPHY, brings this civil action as a related action in the matter entitled IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION, MDL No. 2323.

~~2. Plaintiff is filing this short form complaint as required by this Court's Case Management Order No. 7709, filed October 24, 2017.~~

3. Plaintiff (and, if applicable, Plaintiff's Spouse) continue to maintain claims against Riddell Defendants after a Class Action Settlement was entered into between the NFL Defendants and certain Plaintiffs.

4. Plaintiff (and, if applicable, Plaintiff's Spouse) incorporate by reference the allegations (as designated below) of the Second Amended Master Administrative Long-Form Complaint Against Riddell Defendants, as is fully set forth at length in this Short Form Complaint. ~~However, Plaintiff denies that there is federal subject matter jurisdiction over this action.~~

5. ~~Plaintiff is filing this case in a representative capacity as the _____ of _____, having been duly appointed as the _____ by the Court of _____.~~

6. Plaintiff, Frank Murphy, is a resident and citizen of Georgia and claims damages as set forth below.

7. ~~Plaintiffs Spouse, _____ is a resident and citizen of _____, and claims damages as a result of loss of consortium proximately caused by the harm suffered by her Plaintiff husband.~~

8. Upon information and belief, the Plaintiff sustained repetitive, traumatic subconcussive and/or concussive head impacts during NFL games and/or practices. Upon information and belief, Plaintiff suffers from symptoms of brain injury caused by the repetitive, traumatic sub-concussive and/or concussive head impacts the Plaintiff sustained during NFL games and/or practices. Upon information and belief, the Plaintiff's symptoms arise from injuries that are latent and have developed and continue to develop over time.

9. The original complaint by Plaintiff in this matter was filed in the Circuit Court of Cook County, Illinois on December 19, 2016. ~~If the case is remanded, it should be remanded to the Circuit Court of Cook County, Illinois.~~

10. Plaintiff claim damages as a result of [check all that apply]:

☒ Injury to Herself/Himself

- ☐ Injury to the Person Represented
- ☐ Wrongful death
- ☐ Survivorship Action
- ☒ Economic Loss
- ☒ Loss of Services
- ☒ Loss of Consortium

11. Plaintiff (and Plaintiff Spouse) bring this case against the following Defendants in this action [check all that apply]:

- ☒ Riddell, Inc.
- ☒ All American Sports, Inc. (d/b/a Riddell Sports Group, Inc.)
- ☒ Riddell Sports Group, Inc.
- ☒ Easton-Bell Sports, Inc.
- ☒ Easton-Bell Sports, LLC
- ☒ EB Sports Corporation
- ☒ RBG Holdings Corporation

12. The Plaintiff wore one or more helmets designed and/or manufactured by the Riddell Defendants during one or more years Plaintiff played in the NFL and/or AFL.

13. Plaintiff played in ☒ the National Football League ("NFL") and/or in and/or in the ☐ American Football League ("AFL") during the following period of time: 2000-2004 for the following teams: Tampa Bay Buccaneers, Houston Texans and Miami Dolphins.

14. Plaintiff retired from playing professional football after the 2004 season.

CAUSES OF ACTION

15. Plaintiff herein adopt by reference the following Counts of the Second Amended Master Administrative Long-Form Complaint, along with the factual allegations incorporated by reference in those Counts [check all that apply]:

- √ Count I (Negligence)
- √ Count II (Negligent Marketing)
- √ Count III (Negligent Misrepresentation)
- √ Count IV (Fraud)
- √ Count V (Strict Liability/Design Defect)
- √ Count VI (Failure to Warn)
- √ Count VII (Breach of Implied Warranty)
- √ Count VIII (Civil Conspiracy)
- √ Count IX (Fraudulent Concealment)
- ☐ Count X (Wrongful Death)
- ☐ Count XI (Survival Action)
- √ Count XII (Loss of Consortium)
- √ Count XIII (Punitive Damages under All Claims)
- √ Count XIV (Declaratory Relief: Punitive Damages)

PRAYER FOR RELIEF

WHEREFORE, Plaintiff (and, if applicable Plaintiff Spouse) pray for judgment as follows:

A. An award of compensatory damages, the amount of which will be determined at trial;

- B. An award of economic damages in the form of medical expenses, out of pocket expenses, lost earnings and other economic damages in an amount to be determined at trial;
- C. For punitive and exemplary damages as applicable;
- D. For all applicable statutory damages of the state whose laws will govern this action;
- E. For loss of consortium as applicable;
- F. For declaratory relief as applicable;
- G. For an award of attorneys' fees and costs;
- H. An award of prejudgment interest and costs of suit; and
- I. An award of such other and further relief as the Court deems just and proper.

JURY DEMANDED

Pursuant to Federal Rule of Civil Procedure 38, Plaintiff hereby demand a trial by jury on all issues so triable.

January 10, 2020

Respectfully Submitted:

By: /s/ William T. Gibbs

William T. Gibbs
Corboy & Demetrio, P.C.
Attorneys for Plaintiff
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Chicago, Illinois 60602
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ARDC No. 6282949

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CHELSEA C. OLIVER, Individually; as
Parent and Next Friend of her minor children,
Silas and Simeon Oliver; and, as Personal
Representative of the ESTATE of PAUL
OLIVER, deceased,

Plaintiffs,

v.

BRG SPORTS, LLC, a corporation, f/k/a
EASTON-BELL SPORTS, LLC; EB
SPORTS CORP., a corporation; BRG
SPORTS HOLDINGS CORP., a corporation,
f/k/a RBG HOLDINGS CORP.; BRG
SPORTS, INC.; RIDDELL SPORTS
GROUP, INC.; RIDDELL, INC.; and ALL
AMERICAN SPORTS CORPORATION
(collectively "RIDDELL"),

Defendants.

MDL No. 2323

**IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION**

JURY TRIAL DEMANDED

SHORT FORM COMPLAINT

1. Plaintiffs, CHELSEA C. OLIVER, ET AL, bring this civil action as a related action in the matter entitled IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION, MDL No. 2323.

~~2. Plaintiffs is filing this short form complaint as required by this Court's Case Management Order No. 7709, filed October 24, 2017.~~

3. Plaintiffs (and, if applicable, Plaintiffs s Spouse) continue to maintain claims against Riddell Defendants after a Class Action Settlement was entered into between the NFL Defendants and certain Plaintiffs

4. Plaintiffs (and, if applicable, Plaintiffs Spouse) incorporate by reference the allegations (as designated below) of the Second Amended Master Administrative Long-Form Complaint Against Riddell Defendants, as is fully set forth at length in this Short Form Complaint. ~~However, Plaintiffs denies that there is federal subject matter jurisdiction over this action.~~

5. ~~Plaintiffs is filing this case in a representative capacity as the _____ of _____, having been duly appointed as the _____ by the Court of _____.~~

6. Plaintiffs, CHELSEA C. OLIVER, ET AL, is a resident and citizen of California and claims damages as set forth below.

7. ~~Plaintiff's Spouse, _____ is a resident and citizen of _____, and claims damages as a result of loss of consortium proximately caused by the harm suffered by her Plaintiffs husband.~~

8. Upon information and belief, the Plaintiff sustained repetitive, traumatic subconcussive and/or concussive head impacts during NFL games and/or practices. Upon information and belief, Plaintiffs suffers from symptoms of brain injury caused by the repetitive, traumatic sub-concussive and/or concussive head impacts the Plaintiffs sustained during NFL games and/or practices. Upon information and belief, the Plaintiff's symptoms arise from injuries that are latent and have developed and continue to develop over time.

9. The original complaint by Plaintiffs in this matter was filed in the Circuit Court of Cook County, Illinois on March 11, 2016. ~~If the case is remanded, it should be remanded to the Circuit Court of Cook County, Illinois.~~

10. Plaintiffs claim damages as a result of [check all that apply]:

☒ Injury to Herself/Himself

- ☐ Injury to the Person Represented
- ☐ Wrongful death
- ☐ Survivorship Action
- ☒ Economic Loss
- ☒ Loss of Services
- ☒ Loss of Consortium

11. Plaintiffs (and Plaintiffs Spouse) bring this case against the following Defendants in this action [check all that apply]:

- ☒ Riddell, Inc.
- ☒ All American Sports, Inc. (d/b/a Riddell Sports Group, Inc.)
- ☒ Riddell Sports Group, Inc.
- ☒ Easton-Bell Sports, Inc.
- ☒ Easton-Bell Sports, LLC
- ☒ EB Sports Corporation
- ☒ RBG Holdings Corporation

12. The Plaintiffs wore one or more helmets designed and/or manufactured by the Riddell Defendants during one or more years Plaintiffs played in the NFL and/or AFL.

13. Plaintiffs played in ☒ the National Football League ("NFL") and/or in and/or in the ☐ American Football League ("AFL") during the following period of time: 2007-2011 for the following teams: the San Diego Chargers and the New Orleans Saints.

14. Plaintiffs retired from playing professional football after the 2011 season.

CAUSES OF ACTION

15. Plaintiffs herein adopt by reference the following Counts of the Second Amended Master Administrative Long-Form Complaint, along with the factual allegations incorporated by reference in those Counts [check all that apply]:

- √ Count I (Negligence)
- √ Count II (Negligent Marketing)
- √ Count III (Negligent Misrepresentation)
- √ Count IV (Fraud)
- √ Count V (Strict Liability/Design Defect)
- √ Count VI (Failure to Warn)
- √ Count VII (Breach of Implied Warranty)
- √ Count VIII (Civil Conspiracy)
- √ Count IX (Fraudulent Concealment)
- ☐ Count X (Wrongful Death)
- ☐ Count XI (Survival Action)
- √ Count XII (Loss of Consortium)
- √ Count XIII (Punitive Damages under All Claims)
- √ Count XIV (Declaratory Relief: Punitive Damages)

16. Plaintiff asserts the following additional causes of action [write in or attach]:

- As Plaintiff Chelsea Oliver and her two boys (for who, she is natural parent and guardian) witnessed descendent Oliver shoot himself in the head, they assert Negligent Infliction of Emotional Distress Claims.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs (and, if applicable Plaintiff's Spouse) pray for judgment as follows:

- A. An award of compensatory damages, the amount of which will be determined at trial;
- B. An award of economic damages in the form of medical expenses, out of pocket expenses, lost earnings and other economic damages in an amount to be determined at trial;
- C. For punitive and exemplary damages as applicable;
- D. For all applicable statutory damages of the state whose laws will govern this action;
- E. For loss of consortium as applicable;
- F. For declaratory relief as applicable;
- G. For an award of attorneys' fees and costs;
- H. An award of prejudgment interest and costs of suit; and
- I. An award of such other and further relief as the Court deems just and proper.

JURY DEMANDED

Pursuant to Federal Rule of Civil Procedure 38, Plaintiffs hereby demand a trial by jury on all issues so triable.

January 10, 2020

Respectfully Submitted:

By: /s/ William T. Gibbs

William T. Gibbs
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**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

FRANK ORI,

Plaintiff,

v.

BRG SPORTS, LLC, a corporation, f/k/a
EASTON-BELL SPORTS, LLC; EB
SPORTS CORP., a corporation; BRG
SPORTS HOLDINGS CORP., a corporation,
f/k/a RBG HOLDINGS CORP.; BRG
SPORTS, INC.; RIDDELL SPORTS
GROUP, INC.; RIDDELL, INC.; and ALL
AMERICAN SPORTS CORPORATION
(collectively "RIDDELL"),

Defendants.

MDL No. 2323

**IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION**

JURY TRIAL DEMANDED

SHORT FORM COMPLAINT

1. Plaintiff, FRANK ORI, brings this civil action as a related action in the matter entitled IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION, MDL No. 2323.

~~2. Plaintiff is filing this short form complaint as required by this Court's Case Management Order No. 7709, filed October 24, 2017.~~

3. Plaintiff (and, if applicable, Plaintiff's Spouse) continue to maintain claims against Riddell Defendants after a Class Action Settlement was entered into between the NFL Defendants and certain Plaintiffs.

4. Plaintiff (and, if applicable, Plaintiff's Spouse) incorporate by reference the allegations (as designated below) of the Second Amended Master Administrative Long-Form Complaint Against Riddell Defendants, as is fully set forth at length in this Short Form Complaint. ~~However, Plaintiff denies that there is federal subject matter jurisdiction over this action.~~

5. ~~Plaintiff is filing this case in a representative capacity as the _____ of _____, having been duly appointed as the _____ by the Court of _____.~~

6. Plaintiff, Frank Ori, is a resident and citizen of Florida and claims damages as set forth below.

7. ~~Plaintiffs Spouse, _____ is a resident and citizen of _____, and claims damages as a result of loss of consortium proximately caused by the harm suffered by her Plaintiff husband.~~

8. Upon information and belief, the Plaintiff sustained repetitive, traumatic subconcussive and/or concussive head impacts during NFL games and/or practices. Upon information and belief, Plaintiff suffers from symptoms of brain injury caused by the repetitive, traumatic sub-concussive and/or concussive head impacts the Plaintiff sustained during NFL games and/or practices. Upon information and belief, the Plaintiff's symptoms arise from injuries that are latent and have developed and continue to develop over time.

9. The original complaint by Plaintiff in this matter was filed in the Circuit Court of Cook County, Illinois on August 25, 2016. ~~If the case is remanded, it should be remanded to the Circuit Court of Cook County, Illinois.~~

10. Plaintiff claim damages as a result of [check all that apply]:

☒ Injury to Herself/Himself

- ☐ Injury to the Person Represented
- ☐ Wrongful death
- ☐ Survivorship Action
- ☒ Economic Loss
- ☒ Loss of Services
- ☒ Loss of Consortium

11. Plaintiff (and Plaintiff Spouse) bring this case against the following Defendants in this action [check all that apply]:

- ☒ Riddell, Inc.
- ☒ All American Sports, Inc. (d/b/a Riddell Sports Group, Inc.)
- ☒ Riddell Sports Group, Inc.
- ☒ Easton-Bell Sports, Inc.
- ☒ Easton-Bell Sports, LLC
- ☒ EB Sports Corporation
- ☒ RBG Holdings Corporation

12. The Plaintiff wore one or more helmets designed and/or manufactured by the Riddell Defendants during one or more years Plaintiff played in the NFL and/or AFL.

13. Plaintiff played in ☒ the National Football League ("NFL") and/or in and/or in the ☐ American Football League ("AFL") during the following period of time: 1987-1987 for the following teams: Minnesota Vikings.

14. Plaintiff retired from playing professional football after the 1987 season.

CAUSES OF ACTION

15. Plaintiff herein adopt by reference the following Counts of the Second Amended Master Administrative Long-Form Complaint, along with the factual allegations incorporated by reference in those Counts [check all that apply]:

- √ Count I (Negligence)
- √ Count II (Negligent Marketing)
- √ Count III (Negligent Misrepresentation)
- √ Count IV (Fraud)
- √ Count V (Strict Liability/Design Defect)
- √ Count VI (Failure to Warn)
- √ Count VII (Breach of Implied Warranty)
- √ Count VIII (Civil Conspiracy)
- √ Count IX (Fraudulent Concealment)
- ☐ Count X (Wrongful Death)
- ☐ Count XI (Survival Action)
- √ Count XII (Loss of Consortium)
- √ Count XIII (Punitive Damages under All Claims)
- √ Count XIV (Declaratory Relief: Punitive Damages)

PRAYER FOR RELIEF

WHEREFORE, Plaintiff (and, if applicable Plaintiff Spouse) pray for judgment as follows:

A. An award of compensatory damages, the amount of which will be determined at trial;

- B. An award of economic damages in the form of medical expenses, out of pocket expenses, lost earnings and other economic damages in an amount to be determined at trial;
- C. For punitive and exemplary damages as applicable;
- D. For all applicable statutory damages of the state whose laws will govern this action;
- E. For loss of consortium as applicable;
- F. For declaratory relief as applicable;
- G. For an award of attorneys' fees and costs;
- H. An award of prejudgment interest and costs of suit; and
- I. An award of such other and further relief as the Court deems just and proper.

JURY DEMANDED

Pursuant to Federal Rule of Civil Procedure 38, Plaintiff hereby demand a trial by jury on all issues so triable.

January 10, 2020

Respectfully Submitted:

By: /s/ William T. Gibbs

William T. Gibbs
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ARDC No. 6282949

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MICHAEL PELTON,

Plaintiff,

v.

BRG SPORTS, LLC, a corporation, f/k/a
EASTON-BELL SPORTS, LLC; EB
SPORTS CORP., a corporation; BRG
SPORTS HOLDINGS CORP., a corporation,
f/k/a RBG HOLDINGS CORP.; BRG
SPORTS, INC.; RIDDELL SPORTS
GROUP, INC.; RIDDELL, INC.; and ALL
AMERICAN SPORTS CORPORATION
(collectively "RIDDELL"),

Defendants.

MDL No. 2323

**IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION**

JURY TRIAL DEMANDED

SHORT FORM COMPLAINT

1. Plaintiff, MICHAEL PELTON, brings this civil action as a related action in the matter entitled IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION, MDL No. 2323.

~~2. Plaintiff is filing this short form complaint as required by this Court's Case Management Order No. 7709, filed October 24, 2017.~~

3. Plaintiff (and, if applicable, Plaintiff's Spouse) continue to maintain claims against Riddell Defendants after a Class Action Settlement was entered into between the NFL Defendants and certain Plaintiffs.

4. Plaintiff (and, if applicable, Plaintiff's Spouse) incorporate by reference the allegations (as designated below) of the Second Amended Master Administrative Long-Form Complaint Against Riddell Defendants, as is fully set forth at length in this Short Form Complaint. ~~However, Plaintiff denies that there is federal subject matter jurisdiction over this action.~~

5. ~~Plaintiff is filing this case in a representative capacity as the _____ of _____, having been duly appointed as the _____ by the Court of _____.~~

6. Plaintiff, Michael Pelton, is a resident and citizen of Georgia and claims damages as set forth below.

7. ~~Plaintiffs Spouse, _____ is a resident and citizen of _____, and claims damages as a result of loss of consortium proximately caused by the harm suffered by her Plaintiff husband.~~

8. Upon information and belief, the Plaintiff sustained repetitive, traumatic subconcussive and/or concussive head impacts during NFL games and/or practices. Upon information and belief, Plaintiff suffers from symptoms of brain injury caused by the repetitive, traumatic sub-concussive and/or concussive head impacts the Plaintiff sustained during NFL games and/or practices. Upon information and belief, the Plaintiff's symptoms arise from injuries that are latent and have developed and continue to develop over time.

9. The original complaint by Plaintiff in this matter was filed in the Circuit Court of Cook County, Illinois on August 25, 2016. ~~If the case is remanded, it should be remanded to the Circuit Court of Cook County, Illinois.~~

10. Plaintiff claim damages as a result of [check all that apply]:

☒ Injury to Herself/Himself

- ☐ Injury to the Person Represented
- ☐ Wrongful death
- ☐ Survivorship Action
- ☒ Economic Loss
- ☒ Loss of Services
- ☒ Loss of Consortium

11. Plaintiff (and Plaintiff Spouse) bring this case against the following Defendants in this action [check all that apply]:

- ☒ Riddell, Inc.
- ☒ All American Sports, Inc. (d/b/a Riddell Sports Group, Inc.)
- ☒ Riddell Sports Group, Inc.
- ☒ Easton-Bell Sports, Inc.
- ☒ Easton-Bell Sports, LLC
- ☒ EB Sports Corporation
- ☒ RBG Holdings Corporation

12. The Plaintiff wore one or more helmets designed and/or manufactured by the Riddell Defendants during one or more years Plaintiff played in the NFL and/or AFL.

13. Plaintiff played in ☒ the National Football League ("NFL") and/or in and/or in the ☐ American Football League ("AFL") during the following period of time: 1995-1995 for the following teams: Indianapolis Colts.

14. Plaintiff retired from playing professional football after the 1995 season.

CAUSES OF ACTION

15. Plaintiff herein adopt by reference the following Counts of the Second Amended Master Administrative Long-Form Complaint, along with the factual allegations incorporated by reference in those Counts [check all that apply]:

- √ Count I (Negligence)
- √ Count II (Negligent Marketing)
- √ Count III (Negligent Misrepresentation)
- √ Count IV (Fraud)
- √ Count V (Strict Liability/Design Defect)
- √ Count VI (Failure to Warn)
- √ Count VII (Breach of Implied Warranty)
- √ Count VIII (Civil Conspiracy)
- √ Count IX (Fraudulent Concealment)
- ☐ Count X (Wrongful Death)
- ☐ Count XI (Survival Action)
- √ Count XII (Loss of Consortium)
- √ Count XIII (Punitive Damages under All Claims)
- √ Count XIV (Declaratory Relief: Punitive Damages)

PRAYER FOR RELIEF

WHEREFORE, Plaintiff (and, if applicable Plaintiff Spouse) pray for judgment as follows:

A. An award of compensatory damages, the amount of which will be determined at trial;

- B. An award of economic damages in the form of medical expenses, out of pocket expenses, lost earnings and other economic damages in an amount to be determined at trial;
- C. For punitive and exemplary damages as applicable;
- D. For all applicable statutory damages of the state whose laws will govern this action;
- E. For loss of consortium as applicable;
- F. For declaratory relief as applicable;
- G. For an award of attorneys' fees and costs;
- H. An award of prejudgment interest and costs of suit; and
- I. An award of such other and further relief as the Court deems just and proper.

JURY DEMANDED

Pursuant to Federal Rule of Civil Procedure 38, Plaintiff hereby demand a trial by jury on all issues so triable.

January 10, 2020

Respectfully Submitted:

By: /s/ William T. Gibbs

William T. Gibbs
Corboy & Demetrio, P.C.
Attorneys for Plaintiff
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ARDC No. 6282949

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

REGINALD PHILLIPS,

Plaintiff,

v.

BRG SPORTS, LLC, a corporation, f/k/a
EASTON-BELL SPORTS, LLC; EB
SPORTS CORP., a corporation; BRG
SPORTS HOLDINGS CORP., a corporation,
f/k/a RBG HOLDINGS CORP.; BRG
SPORTS, INC.; RIDDELL SPORTS
GROUP, INC.; RIDDELL, INC.; and ALL
AMERICAN SPORTS CORPORATION
(collectively "RIDDELL"),

Defendants.

MDL No. 2323

**IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION**

JURY TRIAL DEMANDED

SHORT FORM COMPLAINT

1. Plaintiff, REGINALD PHILLIPS, brings this civil action as a related action in the matter entitled IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION, MDL No. 2323.

~~2. Plaintiff is filing this short form complaint as required by this Court's Case Management Order No. 7709, filed October 24, 2017.~~

3. Plaintiff (and, if applicable, Plaintiff's Spouse) continue to maintain claims against Riddell Defendants after a Class Action Settlement was entered into between the NFL Defendants and certain Plaintiffs.

4. Plaintiff (and, if applicable, Plaintiff's Spouse) incorporate by reference the allegations (as designated below) of the Second Amended Master Administrative Long-Form Complaint Against Riddell Defendants, as is fully set forth at length in this Short Form Complaint. ~~However, Plaintiff denies that there is federal subject matter jurisdiction over this action.~~

5. ~~Plaintiff is filing this case in a representative capacity as the _____ of _____, having been duly appointed as the _____ by the Court of _____.~~

6. Plaintiff, Reginald Phillips, is a resident and citizen of Texas and claims damages as set forth below.

7. ~~Plaintiff's Spouse, _____ is a resident and citizen of _____, and claims damages as a result of loss of consortium proximately caused by the harm suffered by her Plaintiff husband.~~

8. Upon information and belief, the Plaintiff sustained repetitive, traumatic subconcussive and/or concussive head impacts during NFL games and/or practices. Upon information and belief, Plaintiff suffers from symptoms of brain injury caused by the repetitive, traumatic sub-concussive and/or concussive head impacts the Plaintiff sustained during NFL games and/or practices. Upon information and belief, the Plaintiff's symptoms arise from injuries that are latent and have developed and continue to develop over time.

9. The original complaint by Plaintiff in this matter was filed in the Circuit Court of Cook County, Illinois on December 19, 2016. ~~If the case is remanded, it should be remanded to the Circuit Court of Cook County, Illinois.~~

10. Plaintiff claim damages as a result of [check all that apply]:

☒ Injury to Herself/Himself

- ☐ Injury to the Person Represented
- ☐ Wrongful death
- ☐ Survivorship Action
- ☒ Economic Loss
- ☒ Loss of Services
- ☒ Loss of Consortium

11. Plaintiff (and Plaintiff Spouse) bring this case against the following Defendants in this action [check all that apply]:

- ☒ Riddell, Inc.
- ☒ All American Sports, Inc. (d/b/a Riddell Sports Group, Inc.)
- ☒ Riddell Sports Group, Inc.
- ☒ Easton-Bell Sports, Inc.
- ☒ Easton-Bell Sports, LLC
- ☒ EB Sports Corporation
- ☒ RBG Holdings Corporation

12. The Plaintiff wore one or more helmets designed and/or manufactured by the Riddell Defendants during one or more years Plaintiff played in the NFL and/or AFL.

13. Plaintiff played in ☒ the National Football League ("NFL") and/or in and/or in the ☐ American Football League ("AFL") during the following period of time: 1985-1988 for the following teams: Chicago Bears and Phoenix Cardinals.

14. Plaintiff retired from playing professional football after the 1988 season.

CAUSES OF ACTION

15. Plaintiff herein adopt by reference the following Counts of the Second Amended Master Administrative Long-Form Complaint, along with the factual allegations incorporated by reference in those Counts [check all that apply]:

- √ Count I (Negligence)
- √ Count II (Negligent Marketing)
- √ Count III (Negligent Misrepresentation)
- √ Count IV (Fraud)
- √ Count V (Strict Liability/Design Defect)
- √ Count VI (Failure to Warn)
- √ Count VII (Breach of Implied Warranty)
- √ Count VIII (Civil Conspiracy)
- √ Count IX (Fraudulent Concealment)
- ☐ Count X (Wrongful Death)
- ☐ Count XI (Survival Action)
- √ Count XII (Loss of Consortium)
- √ Count XIII (Punitive Damages under All Claims)
- √ Count XIV (Declaratory Relief: Punitive Damages)

PRAYER FOR RELIEF

WHEREFORE, Plaintiff (and, if applicable Plaintiff Spouse) pray for judgment as follows:

A. An award of compensatory damages, the amount of which will be determined at trial;

- B. An award of economic damages in the form of medical expenses, out of pocket expenses, lost earnings and other economic damages in an amount to be determined at trial;
- C. For punitive and exemplary damages as applicable;
- D. For all applicable statutory damages of the state whose laws will govern this action;
- E. For loss of consortium as applicable;
- F. For declaratory relief as applicable;
- G. For an award of attorneys' fees and costs;
- H. An award of prejudgment interest and costs of suit; and
- I. An award of such other and further relief as the Court deems just and proper.

JURY DEMANDED

Pursuant to Federal Rule of Civil Procedure 38, Plaintiff hereby demand a trial by jury on all issues so triable.

January 10, 2020

Respectfully Submitted:

By: /s/ William T. Gibbs

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Corboy & Demetrio, P.C.
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ARDC No. 6282949

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

RICKY PORTER,

Plaintiff,

v.

BRG SPORTS, LLC, a corporation, f/k/a
EASTON-BELL SPORTS, LLC; EB
SPORTS CORP., a corporation; BRG
SPORTS HOLDINGS CORP., a corporation,
f/k/a RBG HOLDINGS CORP.; BRG
SPORTS, INC.; RIDDELL SPORTS
GROUP, INC.; RIDDELL, INC.; and ALL
AMERICAN SPORTS CORPORATION
(collectively "RIDDELL"),

Defendants.

MDL No. 2323

**IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION**

JURY TRIAL DEMANDED

SHORT FORM COMPLAINT

1. Plaintiff, RICKY PORTER, brings this civil action as a related action in the matter entitled IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION, MDL No. 2323.

~~2. Plaintiff is filing this short form complaint as required by this Court's Case Management Order No. 7709, filed October 24, 2017.~~

3. Plaintiff (and, if applicable, Plaintiff's Spouse) continue to maintain claims against Riddell Defendants after a Class Action Settlement was entered into between the NFL Defendants and certain Plaintiffs.

4. Plaintiff (and, if applicable, Plaintiff's Spouse) incorporate by reference the allegations (as designated below) of the Second Amended Master Administrative Long-Form Complaint Against Riddell Defendants, as is fully set forth at length in this Short Form Complaint. ~~However, Plaintiff denies that there is federal subject matter jurisdiction over this action.~~

5. ~~Plaintiff is filing this case in a representative capacity as the _____ of _____, having been duly appointed as the _____ by the Court of _____.~~

6. Plaintiff, Ricky Porter, is a resident and citizen of Louisiana and claims damages as set forth below.

7. ~~Plaintiffs Spouse, _____ is a resident and citizen of _____, and claims damages as a result of loss of consortium proximately caused by the harm suffered by her Plaintiff husband.~~

8. Upon information and belief, the Plaintiff sustained repetitive, traumatic subconcussive and/or concussive head impacts during NFL games and/or practices. Upon information and belief, Plaintiff suffers from symptoms of brain injury caused by the repetitive, traumatic sub-concussive and/or concussive head impacts the Plaintiff sustained during NFL games and/or practices. Upon information and belief, the Plaintiff's symptoms arise from injuries that are latent and have developed and continue to develop over time.

9. The original complaint by Plaintiff in this matter was filed in the Circuit Court of Cook County, Illinois on August 25, 2016. ~~If the case is remanded, it should be remanded to the Circuit Court of Cook County, Illinois.~~

10. Plaintiff claim damages as a result of [check all that apply]:

☒ Injury to Herself/Himself

☐ Injury to the Person Represented

☐ Wrongful death

☐ Survivorship Action

☒ Economic Loss

☒ Loss of Services

☒ Loss of Consortium

11. Plaintiff (and Plaintiff Spouse) bring this case against the following Defendants in this action [check all that apply]:

☒ Riddell, Inc.

☒ All American Sports, Inc. (d/b/a Riddell Sports Group, Inc.)

☒ Riddell Sports Group, Inc.

☒ Easton-Bell Sports, Inc.

☒ Easton-Bell Sports, LLC

☒ EB Sports Corporation

☒ RBG Holdings Corporation

12. The Plaintiff wore one or more helmets designed and/or manufactured by the Riddell Defendants during one or more years Plaintiff played in the NFL and/or AFL.

13. Plaintiff played in ☒ the National Football League ("NFL") and/or in and/or in the ☐ American Football League ("AFL") during the following period of time: 1982-1987 for the following teams: Detroit Lions, Baltimore Colts and Buffalo Bills.

14. Plaintiff retired from playing professional football after the 1987 season.

CAUSES OF ACTION

15. Plaintiff herein adopt by reference the following Counts of the Second Amended Master Administrative Long-Form Complaint, along with the factual allegations incorporated by reference in those Counts [check all that apply]:

- √ Count I (Negligence)
- √ Count II (Negligent Marketing)
- √ Count III (Negligent Misrepresentation)
- √ Count IV (Fraud)
- √ Count V (Strict Liability/Design Defect)
- √ Count VI (Failure to Warn)
- √ Count VII (Breach of Implied Warranty)
- √ Count VIII (Civil Conspiracy)
- √ Count IX (Fraudulent Concealment)
- ☐ Count X (Wrongful Death)
- ☐ Count XI (Survival Action)
- √ Count XII (Loss of Consortium)
- √ Count XIII (Punitive Damages under All Claims)
- √ Count XIV (Declaratory Relief: Punitive Damages)

PRAYER FOR RELIEF

WHEREFORE, Plaintiff (and, if applicable Plaintiff Spouse) pray for judgment as follows:

- A. An award of compensatory damages, the amount of which will be determined at trial;
- B. An award of economic damages in the form of medical expenses, out of pocket expenses, lost earnings and other economic damages in an amount to be determined at trial;
- C. For punitive and exemplary damages as applicable;
- D. For all applicable statutory damages of the state whose laws will govern this action;
- E. For loss of consortium as applicable;
- F. For declaratory relief as applicable;
- G. For an award of attorneys' fees and costs;
- H. An award of prejudgment interest and costs of suit; and
- I. An award of such other and further relief as the Court deems just and proper.

JURY DEMANDED

Pursuant to Federal Rule of Civil Procedure 38, Plaintiff hereby demand a trial by jury on all issues so triable.

January 10, 2020

Respectfully Submitted:

By: /s/ William T. Gibbs

William T. Gibbs
Corboy & Demetrio, P.C.
Attorneys for Plaintiff
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ARDC No. 6282949

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JAMES ROUSE,

Plaintiff,

v.

BRG SPORTS, LLC, a corporation, f/k/a
EASTON-BELL SPORTS, LLC; EB
SPORTS CORP., a corporation; BRG
SPORTS HOLDINGS CORP., a corporation,
f/k/a RBG HOLDINGS CORP.; BRG
SPORTS, INC.; RIDDELL SPORTS
GROUP, INC.; RIDDELL, INC.; and ALL
AMERICAN SPORTS CORPORATION
(collectively "RIDDELL"),

Defendants.

MDL No. 2323

**IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION**

JURY TRIAL DEMANDED

SHORT FORM COMPLAINT

1. Plaintiff, JAMES ROUSE, brings this civil action as a related action in the matter entitled IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION, MDL No. 2323.

~~2. Plaintiff is filing this short form complaint as required by this Court's Case Management Order No. 7709, filed October 24, 2017.~~

3. Plaintiff (and, if applicable, Plaintiff's Spouse) continue to maintain claims against Riddell Defendants after a Class Action Settlement was entered into between the NFL Defendants and certain Plaintiffs.

4. Plaintiff (and, if applicable, Plaintiff's Spouse) incorporate by reference the allegations (as designated below) of the Second Amended Master Administrative Long-Form Complaint Against Riddell Defendants, as is fully set forth at length in this Short Form Complaint. ~~However, Plaintiff denies that there is federal subject matter jurisdiction over this action.~~

5. ~~Plaintiff is filing this case in a representative capacity as the _____ of _____, having been duly appointed as the _____ by the Court of _____.~~

6. Plaintiff, James Rouse, is a resident and citizen of Arkansas and claims damages as set forth below.

7. ~~Plaintiff's Spouse, _____ is a resident and citizen of _____, and claims damages as a result of loss of consortium proximately caused by the harm suffered by her Plaintiff husband.~~

8. Upon information and belief, the Plaintiff sustained repetitive, traumatic subconcussive and/or concussive head impacts during NFL games and/or practices. Upon information and belief, Plaintiff suffers from symptoms of brain injury caused by the repetitive, traumatic sub-concussive and/or concussive head impacts the Plaintiff sustained during NFL games and/or practices. Upon information and belief, the Plaintiff's symptoms arise from injuries that are latent and have developed and continue to develop over time.

9. The original complaint by Plaintiff in this matter was filed in the Circuit Court of Cook County, Illinois on December 19, 2016. ~~If the case is remanded, it should be remanded to the Circuit Court of Cook County, Illinois.~~

10. Plaintiff claim damages as a result of [check all that apply]:

☒ Injury to Herself/Himself

- ☐ Injury to the Person Represented
- ☐ Wrongful death
- ☐ Survivorship Action
- ☒ Economic Loss
- ☒ Loss of Services
- ☒ Loss of Consortium

11. Plaintiff (and Plaintiff Spouse) bring this case against the following Defendants in this action [check all that apply]:

- ☒ Riddell, Inc.
- ☒ All American Sports, Inc. (d/b/a Riddell Sports Group, Inc.)
- ☒ Riddell Sports Group, Inc.
- ☒ Easton-Bell Sports, Inc.
- ☒ Easton-Bell Sports, LLC
- ☒ EB Sports Corporation
- ☒ RBG Holdings Corporation

12. The Plaintiff wore one or more helmets designed and/or manufactured by the Riddell Defendants during one or more years Plaintiff played in the NFL and/or AFL.

13. Plaintiff played in ☒ the National Football League ("NFL") and/or in and/or in the ☐ American Football League ("AFL") during the following period of time: 1990-1991 for the following teams: Chicago Bears.

14. Plaintiff retired from playing professional football after the 1991 season.

CAUSES OF ACTION

15. Plaintiff herein adopt by reference the following Counts of the Second Amended Master Administrative Long-Form Complaint, along with the factual allegations incorporated by reference in those Counts [check all that apply]:

- √ Count I (Negligence)
- √ Count II (Negligent Marketing)
- √ Count III (Negligent Misrepresentation)
- √ Count IV (Fraud)
- √ Count V (Strict Liability/Design Defect)
- √ Count VI (Failure to Warn)
- √ Count VII (Breach of Implied Warranty)
- √ Count VIII (Civil Conspiracy)
- √ Count IX (Fraudulent Concealment)
- ☐ Count X (Wrongful Death)
- ☐ Count XI (Survival Action)
- √ Count XII (Loss of Consortium)
- √ Count XIII (Punitive Damages under All Claims)
- √ Count XIV (Declaratory Relief: Punitive Damages)

PRAYER FOR RELIEF

WHEREFORE, Plaintiff (and, if applicable Plaintiff Spouse) pray for judgment as follows:

A. An award of compensatory damages, the amount of which will be determined at trial;

- B. An award of economic damages in the form of medical expenses, out of pocket expenses, lost earnings and other economic damages in an amount to be determined at trial;
- C. For punitive and exemplary damages as applicable;
- D. For all applicable statutory damages of the state whose laws will govern this action;
- E. For loss of consortium as applicable;
- F. For declaratory relief as applicable;
- G. For an award of attorneys' fees and costs;
- H. An award of prejudgment interest and costs of suit; and
- I. An award of such other and further relief as the Court deems just and proper.

JURY DEMANDED

Pursuant to Federal Rule of Civil Procedure 38, Plaintiff hereby demand a trial by jury on all issues so triable.

January 10, 2020

Respectfully Submitted:

By: /s/ William T. Gibbs

William T. Gibbs
Corboy & Demetrio, P.C.
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ARDC No. 6282949

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

YANCEY THIGPEN,

Plaintiff,

v.

BRG SPORTS, LLC, a corporation, f/k/a
EASTON-BELL SPORTS, LLC; EB
SPORTS CORP., a corporation; BRG
SPORTS HOLDINGS CORP., a corporation,
f/k/a RBG HOLDINGS CORP.; BRG
SPORTS, INC.; RIDDELL SPORTS
GROUP, INC.; RIDDELL, INC.; and ALL
AMERICAN SPORTS CORPORATION
(collectively "RIDDELL"),

Defendants.

MDL No. 2323

**IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION**

JURY TRIAL DEMANDED

SHORT FORM COMPLAINT

1. Plaintiff, YANCEY THIGPEN, brings this civil action as a related action in the matter entitled IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION, MDL No. 2323.

~~2. Plaintiff is filing this short form complaint as required by this Court's Case Management Order No. 7709, filed October 24, 2017.~~

3. Plaintiff (and, if applicable, Plaintiff's Spouse) continue to maintain claims against Riddell Defendants after a Class Action Settlement was entered into between the NFL Defendants and certain Plaintiffs.

4. Plaintiff (and, if applicable, Plaintiff's Spouse) incorporate by reference the allegations (as designated below) of the Second Amended Master Administrative Long-Form Complaint Against Riddell Defendants, as is fully set forth at length in this Short Form Complaint. ~~However, Plaintiff denies that there is federal subject matter jurisdiction over this action.~~

5. ~~Plaintiff is filing this case in a representative capacity as the _____ of _____, having been duly appointed as the _____ by the Court of _____.~~

6. Plaintiff, Yancey Thigpen, is a resident and citizen of North Carolina and claims damages as set forth below.

7. ~~Plaintiffs Spouse, _____ is a resident and citizen of _____, and claims damages as a result of loss of consortium proximately caused by the harm suffered by her Plaintiff husband.~~

8. Upon information and belief, the Plaintiff sustained repetitive, traumatic subconcussive and/or concussive head impacts during NFL games and/or practices. Upon information and belief, Plaintiff suffers from symptoms of brain injury caused by the repetitive, traumatic sub-concussive and/or concussive head impacts the Plaintiff sustained during NFL games and/or practices. Upon information and belief, the Plaintiff's symptoms arise from injuries that are latent and have developed and continue to develop over time.

9. The original complaint by Plaintiff in this matter was filed in the Circuit Court of Cook County, Illinois on July 13, 2016. ~~If the case is remanded, it should be remanded to the Circuit Court of Cook County, Illinois.~~

10. Plaintiff claim damages as a result of [check all that apply]:

☒ Injury to Herself/Himself

- ☐ Injury to the Person Represented
- ☐ Wrongful death
- ☐ Survivorship Action
- ☒ Economic Loss
- ☒ Loss of Services
- ☒ Loss of Consortium

11. Plaintiff (and Plaintiff Spouse) bring this case against the following Defendants in this action [check all that apply]:

- ☒ Riddell, Inc.
- ☒ All American Sports, Inc. (d/b/a Riddell Sports Group, Inc.)
- ☒ Riddell Sports Group, Inc.
- ☒ Easton-Bell Sports, Inc.
- ☒ Easton-Bell Sports, LLC
- ☒ EB Sports Corporation
- ☒ RBG Holdings Corporation

12. The Plaintiff wore one or more helmets designed and/or manufactured by the Riddell Defendants during one or more years Plaintiff played in the NFL and/or AFL.

13. Plaintiff played in ☒ the National Football League ("NFL") and/or in and/or in the ☐ American Football League ("AFL") during the following period of time: 1991-2000 for the following teams: San Diego Chargers, Pittsburgh Steelers and Tennessee Titans.

14. Plaintiff retired from playing professional football after the 2000 season.

CAUSES OF ACTION

15. Plaintiff herein adopt by reference the following Counts of the Second Amended Master Administrative Long-Form Complaint, along with the factual allegations incorporated by reference in those Counts [check all that apply]:

- √ Count I (Negligence)
- √ Count II (Negligent Marketing)
- √ Count III (Negligent Misrepresentation)
- √ Count IV (Fraud)
- √ Count V (Strict Liability/Design Defect)
- √ Count VI (Failure to Warn)
- √ Count VII (Breach of Implied Warranty)
- √ Count VIII (Civil Conspiracy)
- √ Count IX (Fraudulent Concealment)
- ☐ Count X (Wrongful Death)
- ☐ Count XI (Survival Action)
- √ Count XII (Loss of Consortium)
- √ Count XIII (Punitive Damages under All Claims)
- √ Count XIV (Declaratory Relief: Punitive Damages)

PRAYER FOR RELIEF

WHEREFORE, Plaintiff (and, if applicable Plaintiff Spouse) pray for judgment as follows:

A. An award of compensatory damages, the amount of which will be determined at trial;

- B. An award of economic damages in the form of medical expenses, out of pocket expenses, lost earnings and other economic damages in an amount to be determined at trial;
- C. For punitive and exemplary damages as applicable;
- D. For all applicable statutory damages of the state whose laws will govern this action;
- E. For loss of consortium as applicable;
- F. For declaratory relief as applicable;
- G. For an award of attorneys' fees and costs;
- H. An award of prejudgment interest and costs of suit; and
- I. An award of such other and further relief as the Court deems just and proper.

JURY DEMANDED

Pursuant to Federal Rule of Civil Procedure 38, Plaintiff hereby demand a trial by jury on all issues so triable.

January 10, 2020

Respectfully Submitted:

By: /s/ William T. Gibbs

William T. Gibbs
Corboy & Demetrio, P.C.
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ARDC No. 6282949

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LABRANDON TOEFIELD,

Plaintiff,

v.

BRG SPORTS, LLC, a corporation, f/k/a
EASTON-BELL SPORTS, LLC; EB
SPORTS CORP., a corporation; BRG
SPORTS HOLDINGS CORP., a corporation,
f/k/a RBG HOLDINGS CORP.; BRG
SPORTS, INC.; RIDDELL SPORTS
GROUP, INC.; RIDDELL, INC.; and ALL
AMERICAN SPORTS CORPORATION
(collectively "RIDDELL"),

Defendants.

MDL No. 2323

**IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION**

JURY TRIAL DEMANDED

SHORT FORM COMPLAINT

1. Plaintiff, LABRANDON TOEFIELD, brings this civil action as a related action in the matter entitled IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION, MDL No. 2323.

~~2. Plaintiff is filing this short form complaint as required by this Court's Case Management Order No. 7709, filed October 24, 2017.~~

3. Plaintiff (and, if applicable, Plaintiff's Spouse) continue to maintain claims against Riddell Defendants after a Class Action Settlement was entered into between the NFL Defendants and certain Plaintiffs.

4. Plaintiff (and, if applicable, Plaintiff's Spouse) incorporate by reference the allegations (as designated below) of the Second Amended Master Administrative Long-Form Complaint Against Riddell Defendants, as is fully set forth at length in this Short Form Complaint. ~~However, Plaintiff denies that there is federal subject matter jurisdiction over this action.~~

5. ~~Plaintiff is filing this case in a representative capacity as the _____ of _____, having been duly appointed as the _____ by the Court of _____.~~

6. Plaintiff, LaBrandon Toefield, is a resident and citizen of Florida and claims damages as set forth below.

7. ~~Plaintiffs Spouse, _____ is a resident and citizen of _____, and claims damages as a result of loss of consortium proximately caused by the harm suffered by her Plaintiff husband.~~

8. Upon information and belief, the Plaintiff sustained repetitive, traumatic subconcussive and/or concussive head impacts during NFL games and/or practices. Upon information and belief, Plaintiff suffers from symptoms of brain injury caused by the repetitive, traumatic sub-concussive and/or concussive head impacts the Plaintiff sustained during NFL games and/or practices. Upon information and belief, the Plaintiff's symptoms arise from injuries that are latent and have developed and continue to develop over time.

9. The original complaint by Plaintiff in this matter was filed in the Circuit Court of Cook County, Illinois on January 17, 2017. ~~If the case is remanded, it should be remanded to the Circuit Court of Cook County, Illinois.~~

10. Plaintiff claim damages as a result of [check all that apply]:

☒ Injury to Herself/Himself

- ☐ Injury to the Person Represented
- ☐ Wrongful death
- ☐ Survivorship Action
- ☒ Economic Loss
- ☒ Loss of Services
- ☒ Loss of Consortium

11. Plaintiff (and Plaintiff Spouse) bring this case against the following Defendants in this action [check all that apply]:

- ☒ Riddell, Inc.
- ☒ All American Sports, Inc. (d/b/a Riddell Sports Group, Inc.)
- ☒ Riddell Sports Group, Inc.
- ☒ Easton-Bell Sports, Inc.
- ☒ Easton-Bell Sports, LLC
- ☒ EB Sports Corporation
- ☒ RBG Holdings Corporation

12. The Plaintiff wore one or more helmets designed and/or manufactured by the Riddell Defendants during one or more years Plaintiff played in the NFL and/or AFL.

13. Plaintiff played in ☒ the National Football League ("NFL") and/or in and/or in the ☐ American Football League ("AFL") during the following period of time: 2003-2008 for the following teams: Jacksonville Jaguars and Carolina Panthers.

14. Plaintiff retired from playing professional football after the 2008 season.

CAUSES OF ACTION

15. Plaintiff herein adopt by reference the following Counts of the Second Amended Master Administrative Long-Form Complaint, along with the factual allegations incorporated by reference in those Counts [check all that apply]:

- √ Count I (Negligence)
- √ Count II (Negligent Marketing)
- √ Count III (Negligent Misrepresentation)
- √ Count IV (Fraud)
- √ Count V (Strict Liability/Design Defect)
- √ Count VI (Failure to Warn)
- √ Count VII (Breach of Implied Warranty)
- √ Count VIII (Civil Conspiracy)
- √ Count IX (Fraudulent Concealment)
- ☐ Count X (Wrongful Death)
- ☐ Count XI (Survival Action)
- √ Count XII (Loss of Consortium)
- √ Count XIII (Punitive Damages under All Claims)
- √ Count XIV (Declaratory Relief: Punitive Damages)

PRAYER FOR RELIEF

WHEREFORE, Plaintiff (and, if applicable Plaintiff Spouse) pray for judgment as follows:

A. An award of compensatory damages, the amount of which will be determined at trial;

- B. An award of economic damages in the form of medical expenses, out of pocket expenses, lost earnings and other economic damages in an amount to be determined at trial;
- C. For punitive and exemplary damages as applicable;
- D. For all applicable statutory damages of the state whose laws will govern this action;
- E. For loss of consortium as applicable;
- F. For declaratory relief as applicable;
- G. For an award of attorneys' fees and costs;
- H. An award of prejudgment interest and costs of suit; and
- I. An award of such other and further relief as the Court deems just and proper.

JURY DEMANDED

Pursuant to Federal Rule of Civil Procedure 38, Plaintiff hereby demand a trial by jury on all issues so triable.

January 10, 2020

Respectfully Submitted:

By: /s/ William T. Gibbs

William T. Gibbs
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**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

VERNON TURNER,

Plaintiff,

v.

BRG SPORTS, LLC, a corporation, f/k/a
EASTON-BELL SPORTS, LLC; EB
SPORTS CORP., a corporation; BRG
SPORTS HOLDINGS CORP., a corporation,
f/k/a RBG HOLDINGS CORP.; BRG
SPORTS, INC.; RIDDELL SPORTS
GROUP, INC.; RIDDELL, INC.; and ALL
AMERICAN SPORTS CORPORATION
(collectively "RIDDELL"),

Defendants.

MDL No. 2323

**IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION**

JURY TRIAL DEMANDED

SHORT FORM COMPLAINT

1. Plaintiff, VERNON TURNER, brings this civil action as a related action in the matter entitled IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION, MDL No. 2323.

~~2. Plaintiff is filing this short form complaint as required by this Court's Case Management Order No. 7709, filed October 24, 2017.~~

3. Plaintiff (and, if applicable, Plaintiff's Spouse) continue to maintain claims against Riddell Defendants after a Class Action Settlement was entered into between the NFL Defendants and certain Plaintiffs.

4. Plaintiff (and, if applicable, Plaintiff's Spouse) incorporate by reference the allegations (as designated below) of the Second Amended Master Administrative Long-Form Complaint Against Riddell Defendants, as is fully set forth at length in this Short Form Complaint. ~~However, Plaintiff denies that there is federal subject matter jurisdiction over this action.~~

5. ~~Plaintiff is filing this case in a representative capacity as the _____ of _____, having been duly appointed as the _____ by the Court of _____.~~

6. Plaintiff, Vernon Turner, is a resident and citizen of Texas and claims damages as set forth below.

7. ~~Plaintiffs Spouse, _____ is a resident and citizen of _____, and claims damages as a result of loss of consortium proximately caused by the harm suffered by her Plaintiff husband.~~

8. Upon information and belief, the Plaintiff sustained repetitive, traumatic subconcussive and/or concussive head impacts during NFL games and/or practices. Upon information and belief, Plaintiff suffers from symptoms of brain injury caused by the repetitive, traumatic sub-concussive and/or concussive head impacts the Plaintiff sustained during NFL games and/or practices. Upon information and belief, the Plaintiff's symptoms arise from injuries that are latent and have developed and continue to develop over time.

9. The original complaint by Plaintiff in this matter was filed in the Circuit Court of Cook County, Illinois on August 25, 2016. ~~If the case is remanded, it should be remanded to the Circuit Court of Cook County, Illinois.~~

10. Plaintiff claim damages as a result of [check all that apply]:

☒ Injury to Herself/Himself

- ☐ Injury to the Person Represented
- ☐ Wrongful death
- ☐ Survivorship Action
- ☒ Economic Loss
- ☒ Loss of Services
- ☒ Loss of Consortium

11. Plaintiff (and Plaintiff Spouse) bring this case against the following Defendants in this action [check all that apply]:

- ☒ Riddell, Inc.
- ☒ All American Sports, Inc. (d/b/a Riddell Sports Group, Inc.)
- ☒ Riddell Sports Group, Inc.
- ☒ Easton-Bell Sports, Inc.
- ☒ Easton-Bell Sports, LLC
- ☒ EB Sports Corporation
- ☒ RBG Holdings Corporation

12. The Plaintiff wore one or more helmets designed and/or manufactured by the Riddell Defendants during one or more years Plaintiff played in the NFL and/or AFL.

13. Plaintiff played in ☒ the National Football League ("NFL") and/or in and/or in the ☐ American Football League ("AFL") during the following period of time: 1990-1995 for the following teams: Buffalo Bills, Los Angeles Rams, Detroit Lions and Tampa Bay Buccaneers.

14. Plaintiff retired from playing professional football after the 1995 season.

CAUSES OF ACTION

15. Plaintiff herein adopt by reference the following Counts of the Second Amended Master Administrative Long-Form Complaint, along with the factual allegations incorporated by reference in those Counts [check all that apply]:

- √ Count I (Negligence)
- √ Count II (Negligent Marketing)
- √ Count III (Negligent Misrepresentation)
- √ Count IV (Fraud)
- √ Count V (Strict Liability/Design Defect)
- √ Count VI (Failure to Warn)
- √ Count VII (Breach of Implied Warranty)
- √ Count VIII (Civil Conspiracy)
- √ Count IX (Fraudulent Concealment)
- ☐ Count X (Wrongful Death)
- ☐ Count XI (Survival Action)
- √ Count XII (Loss of Consortium)
- √ Count XIII (Punitive Damages under All Claims)
- √ Count XIV (Declaratory Relief: Punitive Damages)

PRAYER FOR RELIEF

WHEREFORE, Plaintiff (and, if applicable Plaintiff Spouse) pray for judgment as follows:

A. An award of compensatory damages, the amount of which will be determined at trial;

- B. An award of economic damages in the form of medical expenses, out of pocket expenses, lost earnings and other economic damages in an amount to be determined at trial;
- C. For punitive and exemplary damages as applicable;
- D. For all applicable statutory damages of the state whose laws will govern this action;
- E. For loss of consortium as applicable;
- F. For declaratory relief as applicable;
- G. For an award of attorneys' fees and costs;
- H. An award of prejudgment interest and costs of suit; and
- I. An award of such other and further relief as the Court deems just and proper.

JURY DEMANDED

Pursuant to Federal Rule of Civil Procedure 38, Plaintiff hereby demand a trial by jury on all issues so triable.

January 10, 2020

Respectfully Submitted:

By: /s/ William T. Gibbs

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ARDC No. 6282949

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CLARENCE WILLIAMS,

Plaintiff,

v.

BRG SPORTS, LLC, a corporation, f/k/a
EASTON-BELL SPORTS, LLC; EB
SPORTS CORP., a corporation; BRG
SPORTS HOLDINGS CORP., a corporation,
f/k/a RBG HOLDINGS CORP.; BRG
SPORTS, INC.; RIDDELL SPORTS
GROUP, INC.; RIDDELL, INC.; and ALL
AMERICAN SPORTS CORPORATION
(collectively "RIDDELL"),

Defendants.

MDL No. 2323

**IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION**

JURY TRIAL DEMANDED

SHORT FORM COMPLAINT

1. Plaintiff, CLARENCE WILLIAMS, brings this civil action as a related action in the matter entitled IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION, MDL No. 2323.

~~2. Plaintiff is filing this short form complaint as required by this Court's Case Management Order No. 7709, filed October 24, 2017.~~

3. Plaintiff (and, if applicable, Plaintiff's Spouse) continue to maintain claims against Riddell Defendants after a Class Action Settlement was entered into between the NFL Defendants and certain Plaintiffs.

4. Plaintiff (and, if applicable, Plaintiff's Spouse) incorporate by reference the allegations (as designated below) of the Second Amended Master Administrative Long-Form Complaint Against Riddell Defendants, as is fully set forth at length in this Short Form Complaint. ~~However, Plaintiff denies that there is federal subject matter jurisdiction over this action.~~

5. ~~Plaintiff is filing this case in a representative capacity as the _____ of _____, having been duly appointed as the _____ by the Court of _____.~~

6. Plaintiff, Clarence Williams, is a resident and citizen of Florida and claims damages as set forth below.

7. ~~Plaintiffs Spouse, _____ is a resident and citizen of _____, and claims damages as a result of loss of consortium proximately caused by the harm suffered by her Plaintiff husband.~~

8. Upon information and belief, the Plaintiff sustained repetitive, traumatic subconcussive and/or concussive head impacts during NFL games and/or practices. Upon information and belief, Plaintiff suffers from symptoms of brain injury caused by the repetitive, traumatic sub-concussive and/or concussive head impacts the Plaintiff sustained during NFL games and/or practices. Upon information and belief, the Plaintiff's symptoms arise from injuries that are latent and have developed and continue to develop over time.

9. The original complaint by Plaintiff in this matter was filed in the Circuit Court of Cook County, Illinois on August 25, 2016. ~~If the case is remanded, it should be remanded to the Circuit Court of Cook County, Illinois.~~

10. Plaintiff claim damages as a result of [check all that apply]:

☒ Injury to Herself/Himself

☐ Injury to the Person Represented

☐ Wrongful death

☐ Survivorship Action

☒ Economic Loss

☒ Loss of Services

☒ Loss of Consortium

11. Plaintiff (and Plaintiff Spouse) bring this case against the following Defendants in this action [check all that apply]:

☒ Riddell, Inc.

☒ All American Sports, Inc. (d/b/a Riddell Sports Group, Inc.)

☒ Riddell Sports Group, Inc.

☒ Easton-Bell Sports, Inc.

☒ Easton-Bell Sports, LLC

☒ EB Sports Corporation

☒ RBG Holdings Corporation

12. The Plaintiff wore one or more helmets designed and/or manufactured by the Riddell Defendants during one or more years Plaintiff played in the NFL and/or AFL.

13. Plaintiff played in ☒ the National Football League ("NFL") and/or in and/or in the ☐ American Football League ("AFL") during the following period of time: 1998-1998 for the following teams: Detroit Lions and Minnesota Vikings.

14. Plaintiff retired from playing professional football after the 1998 season.

CAUSES OF ACTION

15. Plaintiff herein adopt by reference the following Counts of the Second Amended Master Administrative Long-Form Complaint, along with the factual allegations incorporated by reference in those Counts [check all that apply]:

- √ Count I (Negligence)
- √ Count II (Negligent Marketing)
- √ Count III (Negligent Misrepresentation)
- √ Count IV (Fraud)
- √ Count V (Strict Liability/Design Defect)
- √ Count VI (Failure to Warn)
- √ Count VII (Breach of Implied Warranty)
- √ Count VIII (Civil Conspiracy)
- √ Count IX (Fraudulent Concealment)
- ☐ Count X (Wrongful Death)
- ☐ Count XI (Survival Action)
- √ Count XII (Loss of Consortium)
- √ Count XIII (Punitive Damages under All Claims)
- √ Count XIV (Declaratory Relief: Punitive Damages)

PRAYER FOR RELIEF

WHEREFORE, Plaintiff (and, if applicable Plaintiff Spouse) pray for judgment as follows:

A. An award of compensatory damages, the amount of which will be determined at trial;

- B. An award of economic damages in the form of medical expenses, out of pocket expenses, lost earnings and other economic damages in an amount to be determined at trial;
- C. For punitive and exemplary damages as applicable;
- D. For all applicable statutory damages of the state whose laws will govern this action;
- E. For loss of consortium as applicable;
- F. For declaratory relief as applicable;
- G. For an award of attorneys' fees and costs;
- H. An award of prejudgment interest and costs of suit; and
- I. An award of such other and further relief as the Court deems just and proper.

JURY DEMANDED

Pursuant to Federal Rule of Civil Procedure 38, Plaintiff hereby demand a trial by jury on all issues so triable.

January 10, 2020

Respectfully Submitted:

By: /s/ William T. Gibbs

William T. Gibbs
Corboy & Demetrio, P.C.
Attorneys for Plaintiff
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ARDC No. 6282949

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

PIERRE WOODS,

Plaintiff,

v.

BRG SPORTS, LLC, a corporation, f/k/a
EASTON-BELL SPORTS, LLC; EB
SPORTS CORP., a corporation; BRG
SPORTS HOLDINGS CORP., a corporation,
f/k/a RBG HOLDINGS CORP.; BRG
SPORTS, INC.; RIDDELL SPORTS
GROUP, INC.; RIDDELL, INC.; and ALL
AMERICAN SPORTS CORPORATION
(collectively "RIDDELL"),

Defendants.

MDL No. 2323

**IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION**

JURY TRIAL DEMANDED

SHORT FORM COMPLAINT

1. Plaintiff, PIERRE WOODS, brings this civil action as a related action in the matter entitled IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION, MDL No. 2323.

~~2. Plaintiff is filing this short form complaint as required by this Court's Case Management Order No. 7709, filed October 24, 2017.~~

3. Plaintiff (and, if applicable, Plaintiff's Spouse) continue to maintain claims against Riddell Defendants after a Class Action Settlement was entered into between the NFL Defendants and certain Plaintiffs.

4. Plaintiff (and, if applicable, Plaintiff's Spouse) incorporate by reference the allegations (as designated below) of the Second Amended Master Administrative Long-Form Complaint Against Riddell Defendants, as is fully set forth at length in this Short Form Complaint. ~~However, Plaintiff denies that there is federal subject matter jurisdiction over this action.~~

5. ~~Plaintiff is filing this case in a representative capacity as the _____ of _____, having been duly appointed as the _____ by the Court of _____.~~

6. Plaintiff, Pierre Woods, is a resident and citizen of Ohio and claims damages as set forth below.

7. ~~Plaintiffs Spouse, _____ is a resident and citizen of _____, and claims damages as a result of loss of consortium proximately caused by the harm suffered by her Plaintiff husband.~~

8. Upon information and belief, the Plaintiff sustained repetitive, traumatic subconcussive and/or concussive head impacts during NFL games and/or practices. Upon information and belief, Plaintiff suffers from symptoms of brain injury caused by the repetitive, traumatic sub-concussive and/or concussive head impacts the Plaintiff sustained during NFL games and/or practices. Upon information and belief, the Plaintiff's symptoms arise from injuries that are latent and have developed and continue to develop over time.

9. The original complaint by Plaintiff in this matter was filed in the Circuit Court of Cook County, Illinois on April 17, 2019. ~~If the case is remanded, it should be remanded to the Circuit Court of Cook County, Illinois.~~

10. Plaintiff claim damages as a result of [check all that apply]:

☒ Injury to Herself/Himself

- ☐ Injury to the Person Represented
- ☐ Wrongful death
- ☐ Survivorship Action
- ☒ Economic Loss
- ☒ Loss of Services
- ☒ Loss of Consortium

11. Plaintiff (and Plaintiff Spouse) bring this case against the following Defendants in this action [check all that apply]:

- ☒ Riddell, Inc.
- ☒ All American Sports, Inc. (d/b/a Riddell Sports Group, Inc.)
- ☒ Riddell Sports Group, Inc.
- ☒ Easton-Bell Sports, Inc.
- ☒ Easton-Bell Sports, LLC
- ☒ EB Sports Corporation
- ☒ RBG Holdings Corporation

12. The Plaintiff wore one or more helmets designed and/or manufactured by the Riddell Defendants during one or more years Plaintiff played in the NFL and/or AFL.

13. Plaintiff played in ☒ the National Football League ("NFL") and/or in and/or in the ☐ American Football League ("AFL") during the following period of time: 2006-2010 for the following teams: New England Patriots and Buffalo Bills.

14. Plaintiff retired from playing professional football after the 2010 season.

CAUSES OF ACTION

15. Plaintiff herein adopt by reference the following Counts of the Second Amended Master Administrative Long-Form Complaint, along with the factual allegations incorporated by reference in those Counts [check all that apply]:

- √ Count I (Negligence)
- √ Count II (Negligent Marketing)
- √ Count III (Negligent Misrepresentation)
- √ Count IV (Fraud)
- √ Count V (Strict Liability/Design Defect)
- √ Count VI (Failure to Warn)
- √ Count VII (Breach of Implied Warranty)
- √ Count VIII (Civil Conspiracy)
- √ Count IX (Fraudulent Concealment)
- ☐ Count X (Wrongful Death)
- ☐ Count XI (Survival Action)
- √ Count XII (Loss of Consortium)
- √ Count XIII (Punitive Damages under All Claims)
- √ Count XIV (Declaratory Relief: Punitive Damages)

PRAYER FOR RELIEF

WHEREFORE, Plaintiff (and, if applicable Plaintiff Spouse) pray for judgment as follows:

A. An award of compensatory damages, the amount of which will be determined at trial;

- B. An award of economic damages in the form of medical expenses, out of pocket expenses, lost earnings and other economic damages in an amount to be determined at trial;
- C. For punitive and exemplary damages as applicable;
- D. For all applicable statutory damages of the state whose laws will govern this action;
- E. For loss of consortium as applicable;
- F. For declaratory relief as applicable;
- G. For an award of attorneys' fees and costs;
- H. An award of prejudgment interest and costs of suit; and
- I. An award of such other and further relief as the Court deems just and proper.

JURY DEMANDED

Pursuant to Federal Rule of Civil Procedure 38, Plaintiff hereby demand a trial by jury on all issues so triable.

January 10, 2020

Respectfully Submitted:

By: /s/ William T. Gibbs

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**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CHARLES WRIGHT,

Plaintiff,

v.

BRG SPORTS, LLC, a corporation, f/k/a
EASTON-BELL SPORTS, LLC; EB
SPORTS CORP., a corporation; BRG
SPORTS HOLDINGS CORP., a corporation,
f/k/a RBG HOLDINGS CORP.; BRG
SPORTS, INC.; RIDDELL SPORTS
GROUP, INC.; RIDDELL, INC.; and ALL
AMERICAN SPORTS CORPORATION
(collectively "RIDDELL"),

Defendants.

MDL No. 2323

**IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION**

JURY TRIAL DEMANDED

SHORT FORM COMPLAINT

1. Plaintiff, CHARLES WRIGHT, brings this civil action as a related action in the matter entitled IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION, MDL No. 2323.

~~2. Plaintiff is filing this short form complaint as required by this Court's Case Management Order No. 7709, filed October 24, 2017.~~

3. Plaintiff (and, if applicable, Plaintiff's Spouse) continue to maintain claims against Riddell Defendants after a Class Action Settlement was entered into between the NFL Defendants and certain Plaintiffs.

4. Plaintiff (and, if applicable, Plaintiff's Spouse) incorporate by reference the allegations (as designated below) of the Second Amended Master Administrative Long-Form Complaint Against Riddell Defendants, as is fully set forth at length in this Short Form Complaint. ~~However, Plaintiff denies that there is federal subject matter jurisdiction over this action.~~

5. ~~Plaintiff is filing this case in a representative capacity as the _____ of _____, having been duly appointed as the _____ by the Court of _____.~~

6. Plaintiff, Charles Wright, is a resident and citizen of Missouri and claims damages as set forth below.

7. ~~Plaintiffs Spouse, _____ is a resident and citizen of _____, and claims damages as a result of loss of consortium proximately caused by the harm suffered by her Plaintiff husband.~~

8. Upon information and belief, the Plaintiff sustained repetitive, traumatic subconcussive and/or concussive head impacts during NFL games and/or practices. Upon information and belief, Plaintiff suffers from symptoms of brain injury caused by the repetitive, traumatic sub-concussive and/or concussive head impacts the Plaintiff sustained during NFL games and/or practices. Upon information and belief, the Plaintiff's symptoms arise from injuries that are latent and have developed and continue to develop over time.

9. The original complaint by Plaintiff in this matter was filed in the Circuit Court of Cook County, Illinois on August 25, 2016. ~~If the case is remanded, it should be remanded to the Circuit Court of Cook County, Illinois.~~

10. Plaintiff claim damages as a result of [check all that apply]:

☒ Injury to Herself/Himself

- ☐ Injury to the Person Represented
- ☐ Wrongful death
- ☐ Survivorship Action
- ☒ Economic Loss
- ☒ Loss of Services
- ☒ Loss of Consortium

11. Plaintiff (and Plaintiff Spouse) bring this case against the following Defendants in this action [check all that apply]:

- ☒ Riddell, Inc.
- ☒ All American Sports, Inc. (d/b/a Riddell Sports Group, Inc.)
- ☒ Riddell Sports Group, Inc.
- ☒ Easton-Bell Sports, Inc.
- ☒ Easton-Bell Sports, LLC
- ☒ EB Sports Corporation
- ☒ RBG Holdings Corporation

12. The Plaintiff wore one or more helmets designed and/or manufactured by the Riddell Defendants during one or more years Plaintiff played in the NFL and/or AFL.

13. Plaintiff played in ☒ the National Football League ("NFL") and/or in and/or in the ☐ American Football League ("AFL") during the following period of time: 1987-1988 for the following teams: St. Louis Cardinals, Dallas Cowboys and Tampa Bay Buccaneers.

14. Plaintiff retired from playing professional football after the 1988 season.

CAUSES OF ACTION

15. Plaintiff herein adopt by reference the following Counts of the Second Amended Master Administrative Long-Form Complaint, along with the factual allegations incorporated by reference in those Counts [check all that apply]:

- √ Count I (Negligence)
- √ Count II (Negligent Marketing)
- √ Count III (Negligent Misrepresentation)
- √ Count IV (Fraud)
- √ Count V (Strict Liability/Design Defect)
- √ Count VI (Failure to Warn)
- √ Count VII (Breach of Implied Warranty)
- √ Count VIII (Civil Conspiracy)
- √ Count IX (Fraudulent Concealment)
- ☐ Count X (Wrongful Death)
- ☐ Count XI (Survival Action)
- √ Count XII (Loss of Consortium)
- √ Count XIII (Punitive Damages under All Claims)
- √ Count XIV (Declaratory Relief: Punitive Damages)

PRAYER FOR RELIEF

WHEREFORE, Plaintiff (and, if applicable Plaintiff Spouse) pray for judgment as follows:

A. An award of compensatory damages, the amount of which will be determined at trial;

- B. An award of economic damages in the form of medical expenses, out of pocket expenses, lost earnings and other economic damages in an amount to be determined at trial;
- C. For punitive and exemplary damages as applicable;
- D. For all applicable statutory damages of the state whose laws will govern this action;
- E. For loss of consortium as applicable;
- F. For declaratory relief as applicable;
- G. For an award of attorneys' fees and costs;
- H. An award of prejudgment interest and costs of suit; and
- I. An award of such other and further relief as the Court deems just and proper.

JURY DEMANDED

Pursuant to Federal Rule of Civil Procedure 38, Plaintiff hereby demand a trial by jury on all issues so triable.

January 10, 2020

Respectfully Submitted:

By: /s/ William T. Gibbs

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